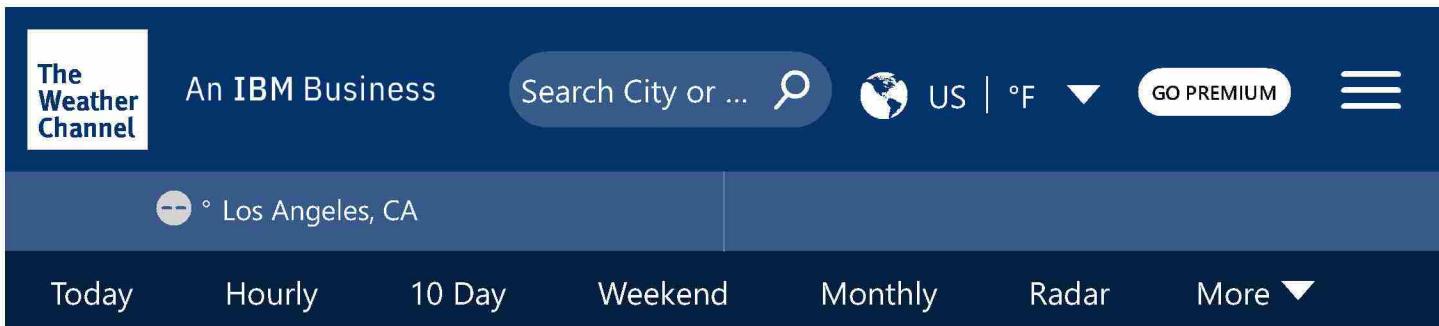


EXHIBIT 85



The Weather Channel

An IBM Business

Search City or ...

Los Angeles, CA

Today Hourly 10 Day Weekend Monthly Radar More ▾

Privacy Policy

Thank you for using our Services. You are currently viewing the privacy policy for the country site that you visited. We are a global website so a different policy may be applicable to you depending on where you access our Services. To view all privacy policies, go to our [Privacy Policy Directory](#). To learn more about The Weather Channel's role in providing our weather information to other companies who present that weather information to users in their own websites or applications, go to our [Weather Services Provider Privacy Explainer](#).

This Privacy Policy is effective as of April 27, 2021. The previous version of this Privacy Policy is available [here](#).

TWC Product and Technology, LLC, doing business as The Weather Company, an IBM business, (sometimes, "we" or "us") is committed to protecting your privacy. This Privacy Policy is important, and we encourage you to carefully read it.

This Privacy Policy discloses how we collect, use, and share data that we gather related to your interaction with this website (the "Site") and on our software applications, mobile applications, and other websites and services that reference or link to this Privacy Policy (together, the "Services"). The Services do not include websites, mobile applications, or other services that link to another privacy policy. This Privacy Policy also describes the choices you have regarding our use of your data and your ability to access, correct, or delete your data. By using the Services, you accept the terms of this Privacy Policy and agree to the data

collection, use, and sharing described in this policy. We may seek your consent by other means such as by asking you to click on a button or to change a setting. Where we do so, we will also offer you a way to revoke your consent.

1. [How and Why We Collect and Use Personal Data and Other Information](#)
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1. How and Why We Collect and Use Personal Data and Other Information

In order to operate the Services and to maximize your experience, we may collect and use information, some of which may be considered personal data. Please note that you may choose not to provide us with certain information; by doing so, however, you may not be able to receive the full range of Services from us. We collect information in the following ways:

- A. *User Account Registration and Subscription.* When you choose to register a user account, you will be required to provide your e-mail address. If you choose to purchase a subscription offering, you may be required to provide information to complete the purchase, such as credit card information.
- B. *Information Provided By You.* You may choose to provide us with information, some of which may be personal data, when you interact

with the Services in the following ways:

- Send us an e-mail message or complete an inquiry form — for example, you might e-mail us with a question and we will use your e-mail address to respond;
- Submit a comment, leave feedback, or send us a photo or video — for example, you might submit a photo of a weather event that we may post on the Services so others can enjoy it;
Special Note about Content Submissions. The Services may from time to time offer areas where you and other users can post or otherwise submit information, photos, videos, graphics, creative suggestions, ideas, notes, concepts, information, ratings or other materials on or to the Services (collectively, "Submissions"). Any geolocation information, tags, or other metadata in Submissions may become publicly available. Any information, including personal data, in your Submissions can be read, collected, or used by others. We cannot control and are not responsible for how others may use the information contained in your Submissions;
- Engage with poll cards — we may receive the information you provide when you submit responses to the poll cards that are placed on the Services; and we may use that information to personalize the Services you visit;
- Engage with interactive advertising — we may receive the information you provide when you submit oral or written questions or comments via the interactive ads that are placed on the Services or on third-party platforms; and we may share this information with our advertisers where required by applicable law; and
- Customize the Services — for example, you might set a "home" location so that every time you visit the Services, you are automatically displayed the weather for that home location.

C. Automatic Collection. We also collect certain information through automated means.

Some of the information we collect through automated means may,

whether alone or combined with other data, be personal data. For example, we automatically collect:

- Information about your device and device capabilities
- Information about your device operating system
- Information about your browser
- Information about how you use the Services
- Your activities on the Services
- IP address
- Advertising identifiers
- Mobile or Internet Carrier
- Browser type
- Browser identifier
- Referring URL

This information helps us to understand, analyze, and measure how users use the Services; manage Services' operations; deliver and measure the effectiveness of advertisements; help diagnose problems; recognize repeat visitors; and facilitate your access to and use of the Services.

D. Location Information. We, our service providers, and Advertising and Analytics Vendors (see [Section 2](#) for more information) may collect location information through the Services. We may share the location information we collect with third parties as addressed in [Section 3](#).

We collect location information to provide you with location-based services (such as severe weather alerts, air quality, and other weather information through our mobile applications), provide advertisements that are relevant to your geographic location, and conduct analytics to improve the Services. The type of location information we collect depends on your settings in the device you use to access the Services.

If you are accessing the Services through the Site, we may detect your general location so that we can automatically show you the weather for

your general area. Depending on browser type and configuration, your browser may inform you that the Site would like to collect your specific location and request your permission to do so. If you do not allow it, or your browser does not permit it, only your general location information is then collected and may be stored locally on your device. You may always manually enter a location (such as city, postal code, and country). On mobile web, if you opt out of sharing your current location, you may continue to receive content that is relevant for the city you have entered in the search bar (i.e., contextual city name).

If you access the Services on your mobile device, we may directly collect precise geographic location information and sensor data via Global Positioning System (GPS), cellular network information, and other location-based features. We typically receive the latitude and longitude of your mobile device, as well as date and time and sensor data such as altimeter. Factors such as device and operating system determine the accuracy of this latitude and longitude and how closely it corresponds with your device's location.

If you allow any of The Weather Channel mobile applications to directly collect location information while the mobile applications are running in the background, you will enable continuous location collection. This may allow us to send you severe weather alerts for the area in which you might be travelling. We also use this location information to conduct analytics, provide relevant advertisements, and improve the Services.

You can turn off direct location collection (or, on some operating systems, continuous direct location collection) through your device settings or by deleting the mobile application from your device. If you turn off location-based services, you may continue to receive alerts for locations that you have selected within the Services.

E. Alerts and Notifications. Certain Services offer you the ability to receive push notifications for weather-related or product updates, news stories,

and special offers. To provide these Services, we may need to collect your device information and/or mobile carrier information, in addition to the postcode or geographic area to which the alert, update, or notification pertains. Where available with our Services, Hands-Free Audio Alerts allow you to receive voice alerts for weather-related updates while you likely are driving. In order to provide you with hands-free alerts, we will need to collect your device's motion data solely to detect when you likely are in a moving vehicle. You can choose to stop sharing your device's motion data at any time, but hands-free alerts are only available when your device's motion data is being shared.

If you no longer wish to receive these types of notifications, you may opt out by turning them off within the settings of your mobile device or the particular Service for which you registered, or by deleting the application.

F. Information from Analytics and Advertising Vendors and Advertisers.

Where legally permissible, we may obtain information about you or your use of the Services from Analytics and Advertising Vendors (See [Section 2](#)) and advertisers. We may combine the information you provide us and information we automatically collect with information from public or third-party sources. If we combine or associate information from other sources with personal data that we collect through the Services, we will treat the combined information as personal data in accordance with this Privacy Policy.

2. Data Collection Technologies and Consumer Choice

We and third parties acting on our behalf, or on behalf of advertisers or vendors, use various technologies that help us to manage the operations of our Services and track usage behavior. These technologies enable us to tailor information and advertisements to make your visits more meaningful and to offer accurate forecast data to everyone, everywhere, free of charge. We follow the self-regulatory principles of the Digital Advertising Alliance

("DAA"), the Digital Advertising Alliance of Canada ("DAAC"), and the European Interactive Digital Advertising Alliance ("EDAA").

We work with a variety of advertising services that use various technologies to collect data about your use of the Services (such as content viewed or ads clicked on) on our behalf or on behalf of advertisers (Advertising Vendors) in order to serve relevant ads. Advertising Vendors use various technologies on the Services to (among other purposes): track how the Services are used, what pages or content users interact with, and what sites or mobile applications users interact with after they leave the Services; link users' devices (i.e., cross-device or cross-platform tracking); and serve more relevant ads on and within the Services or other websites or mobile applications that you visit. Advertising Vendors may combine this data with other information they may have obtained from you or from other sources that is unrelated to your use of the Services in order to target and measure the effectiveness of advertisements. More information about this type of advertising that is tailored to your likely interests based on your activities across other apps or websites ("personalized advertising") is available from the [Network Advertising Initiative's website](#).

We also work with certain entities that use data collection technologies to track, analyze, and report data about the use of the Services and to analyze and optimize the performance of the Services ("Analytics Vendors").

Information collected via the data collection technologies described in this section may be linked to other information about you such as location information and may be considered personal data. We and our vendors may use the technologies described in this section, alone or in combination, to understand user behavior, target and measure the effectiveness of advertisements, help diagnose problems, recognize repeat visitors, and facilitate your access to and use of the Services.

A. Use of Cookies, Web Beacons, and Information Saved by Other Technologies

Third parties may use cookies and other technologies through use of our Services to support or deliver personalized advertising on third-party websites and online services. The data collection technologies we and third parties use on web include but are not limited to:

1. Cookies: Cookies are text files containing small amounts of information that are downloaded to your computer or mobile device when you visit a website and stored within your browser. Cookies are then sent back to the originating website on each subsequent visit to that website or to another website that recognizes those cookies. Some cookies on our Services collect IP and MAC addresses, which may be considered personal data in some jurisdictions. Cookies are useful because they allow a website to recognize a user's device. For more information, please visit this ["All About Cookies"](#) guide. The cookies used on this website can be categorized in the following ways:

Category 1: Strictly Necessary Cookies

These cookies are essential in order to enable you to use the Services and its features.

Category 2: Performance Cookies

These cookies collect information about how you use the Services (such as which pages you go to most often and if you receive error messages). In general, these cookies do not collect information that directly identifies you. However, some such cookies may collect GeolP or other identifiers that may be considered personal data in some jurisdictions.

Category 3: Functionality Cookies

These cookies allow Services to remember choices you make (such as language or the region you are in) and provide enhanced features (such as local weather reports or traffic news). These cookies can also be used to remember changes

you have made to customize the Services.

Category 4: Targeting Cookies

These cookies collect several pieces of information about your browsing habits. They are often placed by advertising networks rather than website operators. They collect information about your interactions over time with the Services as well as with third-party websites and online services. This information may be shared with other organizations such as advertisers in order to provide you with advertisements that may be more relevant to you based on your inferred interests.

Category 5: Social Network Cookies

These cookies are generally generated by content embeds.

They allow social network users to share content and use other features such as publishing comments.

2. Web beacons: Certain pages on the Services contain web beacons, also known as web bugs, pixel tags or clear GIFs. Web beacons allow third parties to obtain information, such as the IP address of the computer that accessed the page on which the web beacon appears, the URL of the page on which the web beacon appears, the time the page containing the web beacon was viewed, the type of browser used to view the page, and the information in cookies sent by the third party.

3. Web Storage: We use local storage, to enhance user experience by, for example, storing your user preferences and settings (e.g., volume/mute) in connection with animated content on the Services. Local storage is similar to browser cookies but can store data more complex than simple text. By itself, local storage cannot do anything to or with the data stored on your device.

B. Use of Advertising Identifiers

We and our Advertising Vendors may collect information about usage of mobile applications via advertising identifiers to support or deliver personalized advertising. An advertising identifier is a randomly-generated alphanumeric code associated with a user's device. Advertising identifiers provide advertisers a way to identify a user's device without using a permanent device identifier, such as serial number.

C. Your Choices Around Cookies, Advertising Identifiers, and Other Technologies Used by Vendors

You have the ability to control how your data is used, including for personalized advertising, in the following ways:

- *Vendors:* This Privacy Policy does not cover the practices of vendors outside of our Services and we do not control vendors' technologies. We provide links to more information about vendors' privacy practices and any available opt outs [here](#).
- *Browser settings:* Your web browser may allow you to manage your cookies and local storage to control access to data about your online activity. We encourage you to check your browser's "Help" feature to learn how to block, disable, and delete cookies. Please note that for technical reasons, if you delete or block certain cookies, some features of the site may be unavailable or may not function as intended. For more information, please visit this "[All About Cookies](#)" guide on managing cookies.
- *Device settings:* The Android and iOS versions 6 to 13 mobile device operating systems allow you to control how your device's advertising identifier is used to support or deliver personalized advertising. The iOS versions 14 and above mobile device operating systems allow you to control use of the advertising identifier and "tracking;" learn about tracking from Apple at Settings > Privacy > Tracking > Learn More

- Android device settings (version 2.3 and above): "Opt out of Ads Personalization" by following the instructions provided by Google [here](#)
- iOS device settings (versions 6 to 13): "Limit Ad Tracking" at Settings > Privacy > Advertising > Limit Ad Tracking
- iOS device settings (versions 14 and above): "Tracking" permissions at Settings > Privacy > Tracking

The opt outs described above are device- or browser-specific and may not be available for all devices. So, if you opt out on your mobile device, you may continue to receive personalized advertising on your desktop computer or other devices. If you choose to opt out, you will still see ads, but the ads will not be based on your activities across other apps and websites you use.

You can also opt out of future information collection from the Services by adjusting the settings on your device, ceasing use of the Service on web, or un-installing the relevant mobile application.

Industry Group Opt-Outs: Some industry organizations offer centralized tools where you can opt out of the use of your data by multiple vendors at once. For more information about Digital Advertising Alliance (DAA) and Network Advertising Initiative (NAI) opt-out tools to assist you in managing choices for participating companies that use cookies, visit the following sites:

- The DAA's [opt-out page](#)
- The Digital Advertising Alliance of Canada's (DAAC's) [opt-out page](#)
- One of the EDAA's country-specific [opt-out pages](#)
- The NAI's [opt-out page](#).

Also, the DAA offers AppChoices, a separate choice tool for users to exercise control over the collection and use of data through mobile applications for personalized advertising and other related uses. To

exercise choice for participating companies, you can install the DAA's AppChoices application on your mobile device. Visit [here](#) for more information on DAA's AppChoices tool.

Information collected via the data collection technologies described in this section may be linked to other information about you such as location information and may be considered personal data. We and vendors may use the technologies described in this section, alone or in combination, to understand user behavior, target and measure the effectiveness of advertisements, help diagnose problems, recognize repeat visitors, and facilitate your access to and use of the Services.

3. How We Share or Disclose Your Information with Vendors

We may also share any information collected from the Services including aggregated or statistical data that we may generate from such information in the following ways:

A. Service Providers. When your data is collected on the Services, it may be shared with select Analytics Vendors and Advertising Vendors that assist us with marketing or advertising campaigns for our brands, and providers of services that assist us with our business operations, with the provision of the Services, or in delivering you the features and functionality that you have requested ("Technology Vendors"). These service providers include companies that support our advertising programs for our brands, provide data storage, support customer service, assist with audience research and product development, facilitate or deliver materials to you, and provide map content for the Services. Our service providers are authorized to use the data that we provide to them only to carry out and improve the service they are providing for us. All such service providers are contractually bound by us to keep the data confidential.

B. Companies Offering Promotions, Products, or Services. At times, we will provide you with the opportunity to choose to receive promotions,

products, or services from third-party sponsors. We also may provide you with the opportunity to receive products and services directly from specifically-identified third parties through the Services. In these instances, you must explicitly consent to receive each offer. When you choose to receive offers from specific third parties, your information is shared with them to enable them to provide you with the offer you have requested. We are not responsible for the information collection practices of these third parties, and all information provided is governed by their privacy policies. You should review the privacy policies of these third parties before supplying personal data to them.

C. Other Websites, Other Services, Plug-Ins and Links. Like many websites on the Internet and other Internet-based services, the Services may link to webpages located on websites or services maintained by various other entities. In some cases, you may navigate to pages of other websites that are framed with elements of the Services such as in the header or footer or an interactive ad. In that case, the URL or prominent text on the other website will identify the site you are visiting. In other cases, such as advertisements, you will be connecting to another site or service when you click on or otherwise activate those opportunities, including click-to-call, click-to-text, and click-to-e-mail opportunities. These other sites and services are not bound by our Privacy Policy, and we are not responsible for their information collection practices. The privacy policies of other organizations may differ from ours, for example, with respect to the level of security, use of cookies, and collection, use and disclosure of personal data. Some of the Services allow users to interact with other websites or services. You may remain logged into those other sites and services until you log off. Your use of those other sites and services is subject to the privacy policies of those sites and services, and not this Privacy Policy.

Some of the Services use third-party operating systems, platforms, communication services, devices, and software elements (such as mobile device operating systems, wireless services, mobile phone, and tablet

devices), and some of the Services are provided by third-party distributors, device makers, device operators, platform operators, and communication services. We do not control these third-party entities, products, and services, and they may collect, use, process, transmit, and disclose your information. As we do not control these third-parties' data handling practices, we recommend that you review their privacy policies, terms of use, and license agreements (if any).

D. Advertising Vendors. We may share information we collect with Advertising Vendors, including those used by our advertisers, so that they can: (i) deliver and/or support the delivery of relevant content or ads on our websites or apps, advertisers' websites or apps, or other third-party websites or apps; (ii) analyze and report on content or ads users see or interact with, and; (iii) improve their services. Advertising Vendors may also collect information via the technologies discussed in [Section 2](#) above or via interactive ads. The information may include data about how users interact with the Services, information users provide via interactive ads, the content and ads users have viewed, users' activities on other websites and online services, and physical places users have visited.

E. Purchase or Sale of Businesses. We continually look for ways to improve our business, including purchasing a business or selling all or part of our business. If we buy, merge, reorganize or sell any business or assets, personal data and non-personal information will likely be disclosed or transferred as part of the transaction.

F. Aggregated Information. As part of the Services, we may aggregate or otherwise alter information (including location information) that is collected from the Services so that it does not identify your device and cannot reasonably be linked to your device. We may use or share such information with third parties for research or commercial purposes (e.g., analyzing trends based on foot traffic). As explained in [Section 1.D.](#) above, you can turn off the collection of location data through your

device settings.

4. Other Limitations on Privacy

We, our affiliates, or our service providers may disclose your data without your permission (i) pursuant to judicial or other government subpoenas, warrants, or orders or otherwise to comply with law; (ii) where we believe an individual's rights, property, or safety or security is at risk; (iii) if we find that your actions violate our [Terms of Use](#) or any of our other legal rights; or (iv) where otherwise required or permitted by applicable law (which may include a lawful access request by U.S. or foreign courts, governments, or law enforcement agencies).

5. Retention Period

We will retain your information for as long as needed to provide and develop the Services. We will also retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements. We may retain information that no longer identifies you indefinitely.

6. Data Rights

You can request to access, obtain a portable copy of, correct, or delete data related to your stored preferences and your use of the Services. Because we do not require users to register in order to use our Services, if you use more than one of our Services, or if you use our Services on more than one device or web browser, you will need to manage your data for each of the Services separately. If you have registered a user account with weather.com and are logged in to your account at the time of the request, we will be able to retrieve data related to your use of the Services while you were logged in. To manage your Data Rights on weather.com, click [here](#). To manage your Data Rights on the iOS or Android app, navigate to Data Rights in the app menu.

At this time, we cannot delete data directly associated with your account without deleting your account, as the data is necessary to keep your

subscription and to provide you with the requested Services. If you wish to correct information related to your account or delete your account and all data associated with it, please click [here](#).

In the event that you consider our processing of data related to your use of the Services not to be compliant with the applicable data protection laws, you can contact us at privacy@weather.com or lodge a complaint with the relevant data protection authority. If you are a California user, you can contact us at californiaprivacy@weather.com.

7. Minors' Privacy

We are committed to protecting the safety and privacy of young people using the Internet. We do not knowingly collect personal data from children under age 18. We believe that children should get their parents' or guardians' consent before giving out any personal data. If you become aware that we have collected personal data from a child without parental consent, please notify us promptly at privacy@weather.com. If we become aware that a child under age 18 has provided us with personal data without parental consent, we will take steps to remove such personal data.

8. International Transfers

The Services are hosted on servers inside and outside the United States. If you are located in the European Union or elsewhere outside of the United States, information that we collect (including through cookies) will be processed and stored in the United States, a jurisdiction in which the data protection and privacy laws may not offer the same level of protection as those in the country where you reside or are a citizen. Subject to applicable law, by using our Services and providing information to use, you consent to the transfer to and processing of information in the United States and other jurisdictions. Where necessary under applicable law, we may employ appropriate cross-border transfer methods governing personal data.

9. Our Commitment to Security

We have put in place physical, electronic, and managerial procedures intended to protect your data. Of course, we cannot guarantee that your communications with the Services will never be unlawfully intercepted or that your data will never be unlawfully accessed by third parties. Any transmission of information is at your own risk.

10. Changes to the Privacy Policy

We reserve the right to change our Privacy Policy as business needs require. If we decide to change our Privacy Policy, we will post those changes here prior to the time they take effect. If we make material changes to the way we use personal data, we will notify affected users through the Services.

11. How to Contact Us

If you have a question related to this Privacy Policy, please contact us at privacy@weather.com or if you are a California user, at californiaprivacy@weather.com, or at:

The Weather Company, an IBM business
Attn: Privacy Office
1001 Summit Boulevard, Floor 20
Brookhaven, GA, USA 30319

12. California Consumer Privacy Act (CCPA) Notice

The California Consumer Privacy Act of 2018 ("CCPA") requires certain disclosures that are covered above in our Privacy Policy. This section provides an overview of the information required by CCPA and how to exercise your CCPA rights.

A. Disclosures about the use of your Personal Information

As described in [Section 1](#) of our Privacy Policy, we collect and use certain information in order to operate the Services and to maximize your experience. The list below includes the categories of personal

information that we will collect about you if you use our Services. It also reflects the categories of personal information that we have collected in the past twelve months:

- Information related to your user account registration and subscription;
- Information provided by you;
- Information automatically collected from your device, in accordance with consumer choice;
- Location information; and
- Information from Analytics and Advertising Vendors.

[Section 3](#) of our Privacy Policy describes how we share or disclose your information with vendors.

In the past twelve months, we have disclosed the following categories of Personal Information as defined by the CCPA for our business purposes to our [Advertising, Analytics and Technology Vendors](#):

- Identifiers such as an online identifier or IP address;
- Commercial information relating to your use of the Services;
- Internet or other electronic network activity information relating to your use of the Services; and
- Geolocation data.

In the past twelve months, we have disclosed the following category of Personal Information as defined by the CCPA for our business purposes to our [Advertising and Analytics Vendors](#):

- Inferences.

If you have registered an account with us and purchased a subscription offering, in the past twelve months, we have disclosed the following categories of Personal Information as defined by the CCPA for our business purposes to our [Technology Vendors](#).

- Identifiers such as a name or email address; and
- Other personal information described in Cal. Civ. Code Section

1798.80(e), such as credit card information.

The CCPA defines the terms "sell" and "sale" broadly to include the sharing of Personal Information with third parties for something of value, even if no money is exchanged. We do not sell users' Personal Information as the term "sell" is commonly understood. However, we do allow Advertising Vendors to use your Personal Information for certain purposes other than providing and improving advertising services for our apps and websites (described in [Section 3.D](#) of our Privacy Policy), which is considered a sale under CCPA. This is the only way that we sell Personal Information under the CCPA, and we do not engage in any other sales of Personal Information under the CCPA.

In the past twelve months, we have sold the following categories of Personal Information as defined by the CCPA to our [Advertising Vendors](#):

- Identifiers such as an online identifier or IP address;
- Commercial information relating to your use of the Services;
- Internet or other electronic network activity information relating to your use of the Services;
- Geolocation data; and
- Inferences.

Information on how you can opt out of selling your information with these vendors for purposes beyond the advertising services they provide us is provided below ("Opt out of sale of your Personal Information"). You also can opt out of sharing your information for personalized advertising through the available web- and app-related opt-outs listed above in [Section 2.C](#).

B. *Data Rights*

Under the CCPA, you have the right to:

- *Know your Personal Information.* You can request information about the Personal Information collected from your use of the Services. You will need to provide your email address so we can return the

requested data to you. Please note that you must make the request from each browser or device where you access the Services, unless you are logged in to your weather.com account at the time of the request.

To request specific pieces of information on weather.com, click [here](#) and select "Request a Portable Copy of Data" from the options.

To request specific pieces of information on the iOS or Android app, navigate to "Data Rights" under "Settings" in the app menu and select "Request a Portable Copy of Data" from the options.

Alternatively, you may mail californiaprivacy@weather.com for further instructions.

Please note that we may take steps to verify your identity before you can make a request to know your Personal Information.

- *Delete your Personal Information.* You can request that we delete the Personal Information that we have collected from your use of the Services. You will need to provide your email address so we can confirm to you that we have fulfilled your request, unless you are logged in to your weather.com account at the time of the request. Please note that you must make the request from each browser or device where you access the Services, unless you are logged in to your weather.com account at the time of the request. We will delete your information unless it is necessary for purposes permitted by CCPA.

To make a deletion request on weather.com, click [here](#) and select "Delete Data" from the options.

To make a deletion request on the iOS or Android app, navigate to "Data Rights" under "Settings" in the app menu and select "Delete Data" from the options.

Alternatively, you may email californiaprivacy@weather.com for further instructions.

- *Opt out of sale of your Personal Information.* You will be opted in by default to the sale of Personal Information. You can opt out of the sale of Personal Information at any time in the following ways. Please note that we do not track users across devices, so you will have to opt out from each device where you access the Services.

Web

- You can access the "Do Not Sell My Personal Information" link in the footer of the website, if you are located in California when you access the Services.
- You can access the "Review my Advertising Settings" link in the footer of the website, if you are not located in California when you access the Services.

App

- You can go to "Privacy Settings" under "Settings" then select "Do Not Sell My Personal Information (Opt Out)" under "California Consumer Privacy Act (CCPA) Right to Opt Out," if you are located in California when you access the Services.
- You can go to "Privacy Settings" under "Settings" then click on the "Do Not Share My Information other than for ads in this app (Opt Out)" under "California Consumer Privacy Act (CCPA) Right to Opt Out," if you are not located in California when you access the Services.

Alternatively, you may also email californiaprivacy@weather.com for further instructions.

- *Non-discrimination.* If you choose to exercise any of these rights, we will not deny goods or services to you or provide different quality of services, unless that difference is reasonably related to the value

provided by your data.

- *Authorized Agent.* You can designate an authorized agent to make a request under the CCPA on your behalf provided that (1) it is a natural person or a business entity registered with the Secretary of State of California; and (2) you have authorized the authorized agent to act on your behalf.

Authorized agents may email californiaprivacy@weather.com for further instructions. To protect your information, please note that we may take steps to verify your identity and we will also ask for a signed permission from you authorizing the authorized agent to submit a request on your behalf.

C. Data Rights Metrics

The California Consumer Privacy Act Regulations ("Regulations") require certain disclosures around the number of requests related to the right to know Personal Information, the right to delete Personal Information, and the right to opt out of sale of Personal Information. This section provides metrics of requests from users located in California made between January 1, 2020 and December 31, 2020.

Number of requests to know:

- Received: 2,414 total requests
- Complied with in whole or in part: 2,278 requests
- Denied (because these requests could not be verified): 136 requests
- Mean response time: 15 days

Number of requests to delete:

- Received: 54,265 total requests
- Complied with in whole or in part: 54,265 requests
- Denied: 0 requests
- Mean response time: 11 days

Number of requests to opt-out:

- Received: 618,164 total requests
- Complied with in whole or in part: 618,164 requests
- Denied: 0 requests
- Mean response time: <1 day

Our U.S. Privacy Policy was last updated April 27, 2021.

13. General Data Protection Regulation (GDPR) Notice

Please note that for the purposes of Regulation (EU) 2016/679 ("GDPR"), the data controller is TWC Product and Technology, LLC, doing business as The Weather Company, an IBM business, which may be contacted at the e-mail or address listed in [Section 11 How to Contact Us](#).

The data controller's legal representative for the European Economic Area (EEA) is IBM International Group B.V., Johan Huizingalaan 765, 1066 VH Amsterdam, The Netherlands; the representative for the United Kingdom is IBM United Kingdom Limited, PO Box 41, North Harbour, Portsmouth, Hampshire, PO6 3AU, United Kingdom. The relevant Data Protection Officer may be contacted at privacy@weather.com. Please be aware that where GDPR applies you have the right to lodge a complaint with the competent data protection authority. The name and contact details of the Data Protection Authorities in the European Union can be found at [here](#).

European Union Minors' Privacy: Where GDPR applies, we do not knowingly collect personal data from children under age 16 (or such lower age permitted under applicable local law not being lower than age 13).

International Transfer: If you are located where GDPR applies, information that we collect (including through cookies) will be processed and stored in the United States. The appropriate cross-border transfer method governing personal data included in such transfers is the EU Standard Contractual Clauses agreement pursuant to EC Decision 2010/87/EU.

Processing Basis: Our processing of your personal data in order to provide you with the Services will typically be based on one of the following processing bases: (i) because you have provided us with your specific, informed, freely-given, and unambiguous consent, (ii) because we need to process it in order to provide you with the Services or a particular feature of the Services; that is, because we cannot readily fulfil your request without performing the relevant processing, or (iii) because the processing is necessary for the purposes of the legitimate interests pursued either by us or by a third party and such legitimate interests are not overridden by your privacy and related rights as an individual. Our legitimate interests include the provision of market-leading weather-related products and services, including the Services.

14. Lei Geral de Proteção de Dados Pessoais (LGPD) Notice

The Lei 13.709/ 2018 (Lei Geral de Proteção de Dados Pessoais, "LGPD") requires certain disclosures that already are covered in our Privacy Policy.

In addition, please note that for the purposes of LGPD, the data controller is TWC Product and Technology, LLC, doing business as The Weather Company, an IBM business, which may be contacted at the e-mail or address listed in [Section 11 How to Contact Us](#).

The relevant Data Protection Officer may be contacted at privacy@weather.com.

Data Rights: Under LGPD, you can request to access your personal data, receive confirmation of the existence of processing and be able to request to receive confirmation about the private and public entities with whom the controller shares the data, and obtain a portable copy of your data. These rights will be fulfilled when you choose to Request a Portable Copy of Data. You also have the right to object to the processing when data is processed unlawfully and to request correction, anonymization, blocking and deletion of unnecessary, excessive data or data processed unlawfully related to your stored preferences and your use of the Services. These rights will be fulfilled

when you choose to Delete Data. You can exercise your data rights on weather.com by clicking [here](#) and on the iOS or Android app by navigating to "Data Rights" under "Settings" in the app menu. Please note that you must make any requests from each browser or device where you access the Services.

International Transfers: If you are located where LGPD applies, information that we collect (including through cookies) will be processed and stored in the United States. The appropriate cross-border transfer method governing personal data included in such transfers is the EU Standard Contractual Clauses agreement pursuant to EC Decision 2010/87/EU.

Processing Basis: Our processing of your personal data in order to provide you with the Services will typically be based on one of the following processing bases (pursuant to Article 7 LGPD):

- Because you have provided us with your specific, informed, freely-given, and unambiguous **consent**; or
- Because the processing is necessary for the purposes of the **legitimate interests** pursued either by us or by a third party and such legitimate interests are not overridden by your privacy and related rights as an individual. Our legitimate interests include the provision of market-leading weather-related products and services, including the Services.

Previous Version of this Privacy Policy

Thank you for using our Services. This Privacy Policy went into effect on March 19, 2021.

TWC Product and Technology, LLC, doing business as The Weather Company, an IBM business, (sometimes, "we" or "us") is committed to protecting your privacy. This Privacy Policy is important, and we encourage you to carefully read it.

This Privacy Policy discloses how we collect, use, and share data that we gather related to your interaction with this website (the "Site") and on our software

applications, mobile applications, and other websites and services that reference or link to this Privacy Policy (together, the "Services"). The Services do not include websites, mobile applications, or other services that link to another privacy policy. This Privacy Policy also describes the choices you have regarding our use of your data and your ability to access, correct, or delete your data. By using the Services, you accept the terms of this Privacy Policy and agree to the data collection, use, and sharing described in this policy. We may seek your consent by other means such as by asking you to click on a button or to change a setting. Where we do so, we will also offer you a way to revoke your consent.

1. [How and Why We Collect and Use Personal Data and Other Information](#)
2. [Data Collection Technologies and Consumer Choice](#)
3. [How We Share or Disclose Your Information with Vendors](#)
4. [Other Limitations on Privacy](#)
5. [Retention Period](#)
6. [Data Rights](#)
7. [Minors' Privacy](#)
8. [International Transfers](#)
9. [Our Commitment to Security](#)
10. [Changes to the Privacy Policy](#)
11. [How to Contact Us](#)
12. [California Consumer Privacy Act \(CCPA\) Notice](#)
13. [General Data Protection Regulation \(GDPR\) Notice](#)
14. [Lei Geral de Proteção de Dados Pessoais \(LGPD\) Notice](#)

1. How and Why We Collect and Use Personal Data and Other Information

In order to operate the Services and to maximize your experience, we may collect and use information, some of which may be considered personal data. Please note that you may choose not to provide us with certain information; by doing so, however, you may not be able to receive the full range of Services from us. We collect information in the following ways:

A. User Account Registration and Subscription. When you choose to register

a user account, you will be required to provide your e-mail address. If you choose to purchase a subscription offering, you may be required to provide information to complete the purchase, such as credit card information.

B. *Information Provided By You.* You may choose to provide us with information, some of which may be personal data, when you interact with the Services in the following ways:

- Send us an e-mail message or complete an inquiry form — for example, you might e-mail us with a question and we will use your e-mail address to respond;
- Submit a comment, leave feedback, or send us a photo or video — for example, you might submit a photo of a weather event that we may post on the Services so others can enjoy it.

Special Note about Content Submissions. The Services may from time to time offer areas where you and other users can post or otherwise submit information, photos, videos, graphics, creative suggestions, ideas, notes, concepts, information, ratings or other materials on or to the Services (collectively, "Submissions"). Any geolocation information, tags, or other metadata in Submissions may become publicly available. Any information, including personal data, in your Submissions can be read, collected, or used by others. We cannot control and are not responsible for how others may use the information contained in your Submissions;

- Engage with interactive advertising — we may receive the information you provide when you submit oral or written questions or comments via the interactive ads that are placed on the Services or on third-party platforms; and we may share this information with our advertisers where required by applicable law; and
- Customize the Services — for example, you might set a "home" location so that every time you visit the Services, you are automatically displayed the weather for that home location.

C. Automatic Collection. We also collect certain information through automated means.

Some of the information we collect through automated means may, whether alone or combined with other data, be personal data. For example, we automatically collect:

- Information about your device and device capabilities
- Information about your device operating system
- Information about your browser
- Information about how you use the Services
- Your activities on the Services
- IP address
- Advertising identifiers
- Mobile or Internet Carrier
- Browser type
- Browser identifier
- Referring URL

This information helps us to understand, analyze, and measure how users use the Services; manage Services' operations; deliver and measure the effectiveness of advertisements; help diagnose problems; recognize repeat visitors; and facilitate your access to and use of the Services.

D. Location Information. We, our service providers, and our Ad and Analytics Vendors (see Section 2 for more information) may collect location information through the Services. We may share the location information we collect with third parties as addressed in Section 3.

We collect location information to provide you with location-based services (such as severe weather alerts, air quality, and other weather information through our mobile applications), provide advertisements that are relevant to your geographic location, and conduct analytics to improve the Services. The type of location information we collect

depends on your settings in the device you use to access the Services.

If you are accessing the Services through the Site, we may detect your general location so that we can automatically show you the weather for your general area. Depending on browser type and configuration, your browser may inform you that the Site would like to collect your specific location and request your permission to do so. If you do not allow it, or your browser does not permit it, only your general location information is then collected and may be stored locally on your device. You may always manually enter a location (such as city, postal code, and country). On mobile web, if you opt out of sharing your current location, you may continue to receive content that is relevant for the city you have entered in the search bar (i.e., contextual city name).

If you access the Services on your mobile device, we may directly collect precise geographic location information and sensor data via Global Positioning System (GPS), cellular network information, and other location-based features. We typically receive the latitude and longitude of your mobile device, as well as date and time and sensor data such as altimeter. Factors such as device and operating system determine the accuracy of this latitude and longitude and how closely it corresponds with your device's location.

If you allow any of The Weather Channel mobile applications to directly collect location information while the mobile applications are running in the background, you will enable continuous location collection. This may allow us to send you severe weather alerts for the area in which you might be travelling. We also use this location information to conduct analytics, provide relevant advertisements, and improve the Services.

You can turn off direct location collection (or, on some operating systems, continuous direct location collection) through your device settings or by deleting the mobile application from your device. If you turn off location-based services, you may continue to receive alerts for

locations that you have selected within the Services.

E. Alerts and Notifications. Certain Services offer you the ability to receive push notifications for weather-related updates, news stories, and special offers. To provide these Services, we may need to collect your device information and/or mobile carrier information, in addition to the postcode or geographic area to which the alert, update, or notification pertains. Where available with our Services, Hands-Free Audio Alerts allow you to receive voice alerts for weather-related updates while you likely are driving. In order to provide you with hands-free alerts, we will need to collect your device's motion data solely to detect when you likely are in a moving vehicle. You can choose to stop sharing your device's motion data at any time, but hands-free alerts are only available when your device's motion data is being shared.

If you no longer wish to receive these types of notifications, you may opt out by turning them off within the settings of your mobile device or the particular Service for which you registered, or by deleting the application.

F. Information from Analytics and Advertising Vendors. Where legally permissible, we may obtain information about you or your use of the Services from our vendors and advertisers. We may combine the information you provide us and information we automatically collect with information from public or third-party sources. If we combine or associate information from other sources with personal data that we collect through the Services, we will treat the combined information as personal data in accordance with this Privacy Policy.

2. Data Collection Technologies and Consumer Choice

We and third parties acting on our behalf or on behalf of our vendors use various technologies that help us to manage the operations of our Services

and track usage behavior. These technologies enable us to tailor information and advertisements to make your visits more meaningful and to offer accurate forecast data to everyone, everywhere, free of charge. We follow the self-regulatory principles of the Digital Advertising Alliance ("DAA"), the Digital Advertising Alliance of Canada ("DAAC"), and the European Interactive Digital Advertising Alliance ("EDAA").

We work with a variety of advertising services ("Ad Vendors"), and advertisers that use various technologies to collect data about your use of the Services (such as content viewed or ads clicked on) in order to serve relevant ads. Ad Vendors use various technologies on the Services to (among other purposes): track how the Services are used, what pages or content users interact with, and what sites or mobile applications users interact with after they leave the Services; link users' devices; and serve more relevant ads on and within the Services or other websites or mobile applications that you visit. Ad Vendors and advertisers may combine this data with other information they may have obtained from you or from other sources that is unrelated to your use of the Services in order to target and measure the effectiveness of advertisements. More information about this type of advertising that is tailored to your likely interests based on your activities across other apps or websites ("personalized advertising") is available from the [Network Advertising Initiative's website](#).

Industry Group Opt Outs: Some industry organizations offer centralized tools where you can opt out of the use of your data by multiple vendors at once. For more information about Digital Advertising Alliance (DAA) and Network Advertising Initiative (NAI) opt-out tools to assist you in managing choices for participating companies that use cookies, visit the following sites:

- The DAA's [opt-out page](#)
- The Digital Advertising Alliance of Canada's (DAAC's) [opt-out page](#)
- One of the EDAA's country-specific [opt-out pages](#)
- The NAI's [opt-out page](#).

Also, the DAA offers AppChoices, a separate choice tool for users to exercise control over the collection and use of data through mobile applications for personalized advertising and other related uses. To exercise choice for participating companies, you can install the DAA's AppChoices application on your mobile device. Visit [here](#) for more information on DAA's AppChoices tool.

We also contract with certain entities that use data collection technologies to track, analyze, and report data about the use of the Services and to analyze and optimize the performance of the Services ("Analytics Vendors").

Information collected via the data collection technologies described in this section may be linked to other information about you such as location information and may be considered personal data. We and our vendors may use the technologies described in this section, alone or in combination, to understand user behavior, target and measure the effectiveness of advertisements, help diagnose problems, recognize repeat visitors, and facilitate your access to and use of the Services.

A. Use of Cookies, Web Beacons, and Information Saved by Other Technologies

Third parties may use cookies and other technologies through use of our Services to support or deliver personalized advertising on third-party websites and online services. The data collection technologies we and third parties use on web include but are not limited to:

- 1. Cookies:** Cookies are text files containing small amounts of information that are downloaded to your computer or mobile device when you visit a website and stored within your browser. Cookies are then sent back to the originating website on each subsequent visit to that website or to another website that recognizes those cookies. Some cookies on our Services collect IP and MAC addresses, which may be considered personal data in

some jurisdictions. Cookies are useful because they allow a website to recognize a user's device. For more information, please visit this ["All About Cookies"](#) guide. The cookies used on this website can be categorized in the following ways:

Category 1: Strictly Necessary Cookies

These cookies are essential in order to enable you to use the Services and its features.

Category 2: Performance Cookies

These cookies collect information about how you use the Services (such as which pages you go to most often and if you receive error messages). In general, these cookies do not collect information that directly identifies you. However, some such cookies may collect GeolP or other identifiers that may be considered personal data in some jurisdictions.

Category 3: Functionality Cookies

These cookies allow Services to remember choices you make (such as language or the region you are in) and provide enhanced features (such as local weather reports or traffic news). These cookies can also be used to remember changes you have made to customize the Services.

Category 4: Targeting Cookies

These cookies collect several pieces of information about your browsing habits. They are often placed by advertising networks rather than website operators. They collect information about your interactions over time with the Services as well as with third-party websites and online services. This information may

be shared with other organizations such as advertisers in order to provide you with advertisements that may be more relevant to you based on your inferred interests.

Category 5: Social Network Cookies

These cookies are generally generated by content embeds.

They allow social network users to share content and use other features such as publishing comments.

2. **Web beacons:** Certain pages on the Services contain web beacons.

Web beacons allow third parties to obtain information, such as the IP address of the computer that accessed the page on which the web beacon appears, the URL of the page on which the web beacon appears, the time the page containing the web beacon was viewed, the type of browser used to view the page, and the information in cookies sent by the third party.

3. **Web Storage:** We use local storage, to enhance user experience by, for example, storing your user preferences and settings (e.g., volume/mute) in connection with animated content on the Services. Local storage is similar to browser cookies but can store data more complex than simple text. By itself, local storage cannot do anything to or with the data stored on your device.

B. Use of Advertising Identifiers

We and our Ad Vendors may collect information about usage of mobile applications via advertising identifiers to support or deliver personalized advertising. An advertising identifier is a randomly-generated alphanumeric code associated with a user's device. Advertising identifiers provide advertisers a way to identify a user's device without using a permanent device identifier, such as serial number.

C. Your Choices Around Cookies, Advertising Identifiers, and Other

Technologies Used by Advertisers and Vendors

You have the ability to control how your data is used, including for personalized advertising, in the following ways:

- Vendors: This Privacy Policy does not cover the practices of our vendors outside of our Services and we do not control our vendors' technologies. We provide links to more information about our vendors' privacy practices and any available opt outs [here](#).
- Browser settings: Your web browser may allow you to manage your cookies and local storage to control access to data about your online activity. We encourage you to check your browser's "Help" feature to learn how to block, disable, and delete cookies. Please note that for technical reasons, if you delete or block certain cookies, some features of the site may be unavailable or may not function as intended. For more information, please visit this "[All About Cookies](#)" guide on managing cookies.
- Device settings: The Android and iOS versions 6 to 13 mobile device operating systems allow you to control how your device's advertising identifier is used to support or deliver personalized advertising. The iOS versions 14 and above mobile device operating systems allow you to control use of the advertising identifier and "tracking;" learn about tracking from Apple at Settings > Privacy > Tracking > Learn More
 - Android device settings (version 2.3 and above): "Opt out of Ads Personalization" by following the instructions provided by Google [here](#)
 - iOS device settings (versions 6 to 13): "Limit Ad Tracking" at Settings > Privacy > Advertising > Limit Ad Tracking
 - iOS device settings (versions 14 and above): "Tracking" permissions at Settings > Privacy > Tracking

The opt outs described above are device- or browser-specific and may not be available for all devices. So, if you opt out on your mobile device,

you may continue to receive personalized advertising on your desktop computer or other devices. If you choose to opt out, you will still see ads, but the ads will not be based on your activities across other apps and websites you use.

You can also opt out of future information collection from the Services by adjusting the settings on your device, ceasing use of the Service on web, or un-installing the relevant mobile application. We also contract with certain entities that use data collection technologies to track, analyze, and report data about the use of the Services and to analyze and optimize the performance of the Services ("Analytics Vendors").

Information collected via the data collection technologies described in this section may be linked to other information about you such as location information and may be considered personal data. We and our vendors may use the technologies described in this section, alone or in combination, to understand user behavior, target and measure the effectiveness of advertisements, help diagnose problems, recognize repeat visitors, and facilitate your access to and use of the Services.

3. How We Share or Disclose Your Information with Vendors

We may also share any information collected from the Services including aggregated or statistical data that we may generate from such information in the following ways:

A. Service Providers. When your data is collected on the Services, it may be shared with select Analytics Vendors and Ad Vendors that assist us with marketing or advertising campaigns for our brands, and providers of services that assist us with our business operations, with the provision of the Services, or in delivering you the features and functionality that you have requested ("Technology Vendors"). These service providers include companies that support our advertising programs for our brands, provide data storage, support customer service, assist with audience

research and product development, facilitate or deliver materials to you, and provide map content for the Services. Our service providers are authorized to use the data that we provide to them only to carry out the service they are providing for us. All such service providers are contractually bound by us to keep the data confidential.

B. Companies Offering Promotions, Products, or Services. We may share location data, advertising identifiers, IP address, and aggregate usage statistics for the Services with advertisers.

At times, we will provide you with the opportunity to choose to receive promotions, products, or services from third-party sponsors. We also may provide you with the opportunity to receive products and services directly from specifically-identified third parties through the Services. In these instances, you must explicitly consent to receive each offer. When you choose to receive offers from specific third parties, your information is shared with them to enable them to provide you with the offer you have requested. We are not responsible for the information collection practices of these third parties, and all information provided is governed by their privacy policies. You should review the privacy policies of these third parties before supplying personal data to them.

C. Other Websites, Other Services, Plug-Ins and Links. Like many websites on the Internet and other Internet-based services, the Services may link to webpages located on websites or services maintained by various other entities. In some cases, you may navigate to pages of other websites that are framed with elements of the Services such as in the header or footer or an interactive ad. In that case, the URL or prominent text on the other website will identify the site you are visiting. In other cases, such as advertisements, you will be connecting to another site or service when you click on or otherwise activate those opportunities, including click-to-call, click-to-text, and click-to-e-mail opportunities. These other sites and services are not bound by our Privacy Policy, and

we are not responsible for their information collection practices. The privacy policies of other organizations may differ from ours, for example, with respect to the level of security, use of cookies, and collection, use and disclosure of personal data.

Some of the Services allow users to interact with other websites or services. You may remain logged into those other sites and services until you log off. Your use of those other sites and services is subject to the privacy policies of those sites and services, and not this Privacy Policy.

Some of the Services use third-party operating systems, platforms, communication services, devices, and software elements (such as mobile device operating systems, wireless services, mobile phone, and tablet devices), and some of the Services are provided by third-party distributors, device makers, device operators, platform operators, and communication services. We do not control these third-party entities, products, and services, and they may collect, use, process, transmit, and disclose your information. As we do not control these third-parties' data handling practices, we recommend that you review their privacy policies, terms of use, and license agreements (if any).

D. Ad Vendors and advertisers. We may share information we collect with Ad Vendors and advertisers so that they can: (i) deliver and/or support the delivery of relevant content or ads on our websites or apps, their own websites or apps, or other third-party websites or apps, and; (ii) analyze and report on content or ads users see or interact with. Ad Vendors and advertisers may also collect information via the technologies discussed in section 2 above or via interactive ads. The information may include data about how users interact with the Services, information users provide via interactive ads, the content and ads users have viewed, users' activities on other websites and online services, and physical places users have visited.

E. Purchase or Sale of Businesses. We continually look for ways to improve

our business, including purchasing a business or selling all or part of our business. If we buy, merge, reorganize or sell any business or assets, personal data and non-personal information will likely be disclosed or transferred as part of the transaction.

F. Aggregated Information. As part of the Services, we may aggregate or otherwise alter information (including location information) that is collected from the Services so that it does not identify your device and cannot reasonably be linked to your device. We may use or share such information with third parties for research or commercial purposes (e.g., analyzing trends based on foot traffic). As explained in Section 1.C. above, you can turn off the collection of location data through your device settings.

4. Other Limitations on Privacy

We, our affiliates, or our service providers may disclose your data without your permission (i) pursuant to judicial or other government subpoenas, warrants, or orders or otherwise to comply with law; (ii) where we believe an individual's rights, property, or safety or security is at risk; (iii) if we find that your actions violate our [Terms of Use](#) or any of our other legal rights; or (iv) where otherwise required or permitted by applicable law (which may include a lawful access request by U.S. or foreign courts, governments, or law enforcement agencies).

5. Retention Period

We will retain your information for as long as needed to provide and develop the Services. We will also retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements. We may retain information that no longer identifies you indefinitely.

6. Data Rights

You can request to access, obtain a portable copy of, correct, or delete data related to your stored preferences and your use of the Services. Because we do not require users to register in order to use our Services, if you use more than one of our Services, or if you use our Services on more than one device or web browser, you will need to manage your data for each of the Services separately. If you have registered a user account with weather.com and are logged in to your account at the time of the request, we will be able to retrieve data related to your use of the Services while you were logged in. To manage your Data Rights on weather.com, click [here](#). To manage your Data Rights on the iOS or Android app, navigate to Data Rights in the app menu.

At this time, we cannot delete data directly associated with your account without deleting your account, as the data is necessary to keep your subscription and to provide you with the requested Services. If you wish to correct information related to your account or delete your account and all data associated with it, please click [here](#).

In the event that you consider our processing of data related to your use of the Services not to be compliant with the applicable data protection laws, you can contact us at privacy@weather.com or lodge a complaint with the relevant data protection authority. If you are a California user, you can contact us at californiaprivacy@weather.com.

7. Minors' Privacy

We are committed to protecting the safety and privacy of young people using the Internet. We do not knowingly collect personal data from children under age 18. We believe that children should get their parents' or guardians' consent before giving out any personal data. If you become aware that we have collected personal data from a child without parental consent, please notify us promptly at privacy@weather.com. If we become aware that a child under age 18 has provided us with personal data without parental consent, we will take steps to remove such personal data.

8. International Transfers

The Services are hosted on servers inside and outside the United States. If you are located in the European Union or elsewhere outside of the United States, information that we collect (including through cookies) will be processed and stored in the United States, a jurisdiction in which the data protection and privacy laws may not offer the same level of protection as those in the country where you reside or are a citizen. Subject to applicable law, by using our Services and providing information to use, you consent to the transfer to and processing of information in the United States and other jurisdictions. Where necessary under applicable law, we may employ appropriate cross-border transfer methods governing personal data.

9. Our Commitment to Security

We have put in place physical, electronic, and managerial procedures intended to protect your data. Of course, we cannot guarantee that your communications with the Services will never be unlawfully intercepted or that your data will never be unlawfully accessed by third parties. Any transmission of information is at your own risk.

10. Changes to the Privacy Policy

We reserve the right to change our Privacy Policy as business needs require. If we decide to change our Privacy Policy, we will post those changes here prior to the time they take effect. If we make material changes to the way we use personal data, we will notify affected users through the Services.

11. How to Contact Us

If you have a question related to this Privacy Policy, please contact us at privacy@weather.com or if you are a California user, at californiaprivacy@weather.com, or at:

The Weather Company, an IBM business
Attn: Privacy Office

1001 Summit Boulevard, Floor 20
Brookhaven, GA, USA 30319

12. California Consumer Privacy Act (CCPA) Notice

The California Consumer Privacy Act of 2018 ("CCPA") requires certain disclosures that are covered above in our Privacy Policy. This section provides an overview of the information required by CCPA and how to exercise your CCPA rights.

A. Disclosures about the use of your Personal Information

As described in [Section 1](#) of our Privacy Policy, we collect and use certain information in order to operate the Services and to maximize your experience. The list below includes the categories of personal information that we will collect about you if you use our Services. It also reflects the categories of personal information that we have collected in the past twelve months:

- Information related to your user account registration and subscription;
- Information provided by you;
- Information automatically collected from your device, in accordance with consumer choice;
- Location information; and
- Information from Analytics and Advertising Vendors.

[Section 3](#) of our Privacy Policy describes how we share or disclose your information with vendors.

In the past twelve months, we have disclosed the following categories of Personal Information as defined by the CCPA for our business purposes to our [Advertising, Analytics and Technology Vendors](#):

- Identifiers such as an online identifier or IP address;

- Commercial information relating to your use of the Services;
- Internet or other electronic network activity information relating to your use of the Services; and
- Geolocation data.

In the past twelve months, we have disclosed the following category of Personal Information as defined by the CCPA for our business purposes to our [Advertising and Analytics Vendors](#):

- Inferences.

If you have registered an account with us and purchased a subscription offering, in the past twelve months, we have disclosed the following categories of Personal Information as defined by the CCPA for our business purposes to our [Technology Vendors](#).

- Identifiers such as a name or email address; and
- Other personal information described in Cal. Civ. Code Section 1798.80(e), such as credit card information.

The CCPA defines the terms "sell" and "sale" broadly to include the sharing of Personal Information with third parties for something of value, even if no money is exchanged. We do not sell users' Personal Information as the term "sell" is commonly understood. However, we do allow advertising vendors to use your Personal Information for certain purposes other than providing and improving advertising services for our apps and websites (described in [Section 3.D](#) of our Privacy Policy), which is considered a sale under CCPA. This is the only way that we sell Personal Information under the CCPA, and we do not engage in any other sales of Personal Information under the CCPA.

In the past twelve months, we have sold the following categories of Personal Information as defined by the CCPA to our [Advertising Vendors](#):

- Identifiers such as an online identifier or IP address;
- Commercial information relating to your use of the Services;
- Internet or other electronic network activity information relating to your use of the Services;
- Geolocation data; and
- Inferences.

Information on how you can opt out of selling your information with these vendors for purposes beyond the advertising services they provide us is provided below ("Opt out of sale of your Personal Information"). You also can opt out of sharing your information for personalized advertising through the available web- and app-related opt-outs listed above in [Section 2.C.](#)

B. Data Rights

Under the CCPA, you have the right to:

- *Know your Personal Information.* You can request information about the Personal Information collected from your use of the Services. You will need to provide your email address so we can return the requested data to you. Please note that you must make the request from each browser or device where you access the Services, unless you are logged in to your weather.com account at the time of the request.

To request specific pieces of information on weather.com, click [here](#) and select "Request a Portable Copy of Data" from the options.

To request specific pieces of information on the iOS or Android app, navigate to "Data Rights" under "Settings" in the app menu and select "Request a Portable Copy of Data" from the options.

Alternatively, you may email californiaprivacy@weather.com for further instructions.

Please note that we may take steps to verify your identity before you can make a request to know your Personal Information.

- *Delete your Personal Information.* You can request that we delete the Personal Information that we have collected from your use of the Services. You will need to provide your email address so we can confirm to you that we have fulfilled your request, unless you are logged in to your weather.com account at the time of the request. Please note that you must make the request from each browser or device where you access the Services, unless you are logged in to your weather.com account at the time of the request. We will delete your information unless it is necessary for purposes permitted by CCPA.

To make a deletion request on weather.com, click [here](#) and select "Delete Data" from the options.

To make a deletion request on the iOS or Android app, navigate to "Data Rights" under "Settings" in the app menu and select "Delete Data" from the options.

Alternatively, you may email californiaprivacy@weather.com for further instructions.

- *Opt out of sale of your Personal Information.* You will be opted in by default to the sale of Personal Information. You can opt out of the sale of Personal Information at any time in the following ways. Please note that we do not track users across devices, so you will have to opt out from each device where you access the Services.
Web
- You can access the "Do Not Sell My Personal Information" link in

the footer of the website, if you are located in California when you access the Services.

- You can access the "Review my Advertising Settings" link in the footer of the website, if you are not located in California when you access the Services.

App

- You can go to "Privacy Settings" under "Settings" then select "Do Not Sell My Personal Information (Opt Out)" under "California Consumer Privacy Act (CCPA) Right to Opt Out," if you are located in California when you access the Services.

- You can go to "Privacy Settings" under "Settings" then click on the "Do Not Share My Information other than for ads in this app (Opt Out)" under "California Consumer Privacy Act (CCPA) Right to Opt Out," if you are not located in California when you access the Services.

Alternatively, you may also email californiaprivacy@weather.com for further instructions.

- *Non-discrimination.* If you choose to exercise any of these rights, we will not deny goods or services to you or provide different quality of services, unless that difference is reasonably related to the value provided by your data.
- *Authorized Agent.* You can designate an authorized agent to make a request under the CCPA on your behalf provided that (1) it is a natural person or a business entity registered with the Secretary of State of California; and (2) you have authorized the authorized agent to act on your behalf.

Authorized agents may email californiaprivacy@weather.com for further instructions. To protect your information, please note that we may take steps to verify your identity and we will also ask for a

signed permission from you authorizing the authorized agent to submit a request on your behalf.

Our U.S. Privacy Policy was last updated March 19, 2021.

13. General Data Protection Regulation (GDPR) Notice

Please note that for the purposes of Regulation (EU) 2016/679 ("GDPR"), the data controller is TWC Product and Technology, LLC, doing business as The Weather Company, an IBM business, which may be contacted at the e-mail or address listed in [Section 11 How to Contact Us](#).

The data controller's legal representative is IBM International Group B.V., Johan Huizingalaan 765, 1066 VH Amsterdam, The Netherlands and the relevant Data Protection Officer may be contacted at privacy@weather.com. Please be aware that where GDPR applies you have the right to lodge a complaint with the competent data protection authority. The name and contact details of the Data Protection Authorities in the European Union can be found at [here](#).

European Union Minors' Privacy: Where GDPR applies, we do not knowingly collect personal data from children under age 16 (or such lower age permitted under applicable local law not being lower than age 13).

International Transfer: If you are located where GDPR applies, information that we collect (including through cookies) will be processed and stored in the United States. The appropriate cross-border transfer method governing personal data included in such transfers is the EU Standard Contractual Clauses agreement pursuant to EC Decision 2010/87/EU.

Processing Basis: Our processing of your personal data in order to provide you with the Services will typically be based on one of the following processing bases: (i) because you have provided us with your specific, informed, freely-given, and unambiguous consent, (ii) because we need to process it in order to provide you with the Services or a particular feature of

the Services; that is, because we cannot readily fulfil your request without performing the relevant processing, or (iii) because the processing is necessary for the purposes of the legitimate interests pursued either by us or by a third party and such legitimate interests are not overridden by your privacy and related rights as an individual. Our legitimate interests include the provision of market-leading weather-related products and services, including the Services.

14. Lei Geral de Proteção de Dados Pessoais (LGPD) Notice

The Lei 13.709/ 2018 (Lei Geral de Proteção de Dados Pessoais, "LGPD") requires certain disclosures that already are covered in our Privacy Policy.

In addition, please note that for the purposes of LGPD, the data controller is TWC Product and Technology, LLC, doing business as The Weather Company, an IBM business, which may be contacted at the e-mail or address listed in [Section 11 How to Contact Us](#).

The relevant Data Protection Officer may be contacted at privacy@weather.com.

Data rights: under LGPD, you can request to access your personal data, receive confirmation of the existence of processing and be able to request to receive confirmation about the private and public entities with whom the controller shares the data, obtain a portable copy of your data, object to the processing when data is processed unlawfully and to request correction, anonymization, blocking and deletion of unnecessary, excessive data or data processed unlawfully related to your stored preferences and your use of the Services. You can exercise your data rights on [weather.com](#) by clicking [here](#) and on the iOS or Android app by navigating to "Data Rights" under "Settings" in the app menu. Please note that you must make any requests from each browser or device where you access the Services.

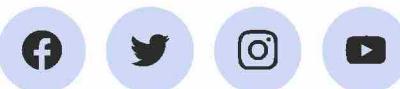
International Transfers: If you are located where LGPD applies, information

that we collect (including through cookies) will be processed and stored in the United States. The appropriate cross-border transfer method governing personal data included in such transfers is the EU Standard Contractual Clauses agreement pursuant to EC Decision 2010/87/EU.

Processing Basis: Our processing of your personal data in order to provide you with the Services will typically be based on one of the following processing bases (pursuant to Articles 7 to 10 LGPD):

- Because you have provided us with your specific, informed, freely-given, and unambiguous **consent**,
- Because **we need to process your personal data in order to provide you with the Services or a particular feature of the Services**, or
- Because the processing is necessary for the purposes of the **legitimate interests** pursued either by us or by a third party and such legitimate interests are not overridden by your privacy and related rights as an individual. Our legitimate interests include the provision of market-leading weather-related products and services, including the Services.

Connect With Us



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An IBM Business

The Weather Channel

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We recognize our responsibility to use data and technology for good. Take control of your data.

[Privacy Settings](#) | [Do Not Sell My Personal Information](#) | [Data Rights](#)

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EXHIBIT 86



Privacy Policy

Keeping customer information private is a priority for DiCello Levitt. To enable us to provide you with relevant information, we need to collect certain information from you. However, we want to emphasize that we are committed to maintaining the privacy of this information.

Information We Collect

We collect non-public personal information about you from the following sources:

Information we receive from you on applications or other forms (such as your name, address, address, email address, and phone number).

Cookies

Please do not submit any confidential, proprietary or sensitive personally identifiable information (e.g. Social Security Number;

driver's license number; or credit card, bank account or other financial information). If you do you do so at your own risk and we will not be liable to you or responsible for consequences of your submission.

Information We Share

We do not disclose any non-public personal information about our customers or former customers to any non-affiliated entity except as described below and otherwise required by law. We may disclose all of the information we collect, as described above, to provider companies that assist us in the servicing or administration of the service you have requested or authorized. When information is shared with companies that perform services on our behalf, we protect against the subsequent disclosure of that information. In no event do we disclose your personal information to companies that will use that information to contact you about their own products or services.

We may also disclose your personal information if required to do so by law (for example, a subpoena) or regulation, or in good faith to:

- (a) comply with legal process served on us or
- (b) protect our rights and property

Use of Web Server Logs and Cookies

When you visit our website, we may track information about your visit and store that information in web server logs, which are records of the activities on our sites. The servers automatically capture and save the information electronically. Examples of the information we may collect include: your unique Internet protocol address; the name of your unique Internet service provider; the town/city, county/state and country from which you access our website; the kind of browser or computer you use; the number of links you click within the site; the date and time of your visit; the web page from which you arrived to our site; the pages you viewed on the site; and certain searches/queries that you conducted via our website(s). The information we collect in web server logs helps us administer the site, analyze its usage, protect the website and its content from inappropriate use and improve the user's experience.

In order to offer and provide a customized and personal service, our websites and applications may use cookies to store and help track information about you. Cookies are simply small pieces of data that are sent to your browser from a Web server and stored on your computer's hard drive. We use cookies to help remind us who you are and to help you navigate our sites during your visits. Cookies allow us to save passwords and preferences for you so you won't have to re-enter them each time you visit. The use of cookies is relatively standard. Most browsers are initially set up to accept cookies. However, if you prefer, you can set your browser to either notify you when you receive a cookie, or to refuse to accept

cookies. You should understand that some features of many sites may not function properly if you don't accept cookies.

Our Security Procedures

We restrict access to non-public personal information about you to those persons who need such information to provide products or services to you. We maintain physical, electronic and procedural safeguards that comply with applicable regulations to guard your non-public personal information. However, we cannot guarantee that unauthorized persons will always be unable to defeat our security measures.

Changes to Privacy Policy

DiCello Levitt reserves the right, in its sole discretion, to revise, change, or modify this Privacy Policy at time. We will incorporate all material changes to this Privacy Policy on this page and will provide advance notice to you. Such notice may be given in any manner we choose that complies with law, including, but not limited to posting a notice of such changes on the Web Sites. We encourage you to review this page periodically for the most recent version of this Privacy Policy. Any use by a User of the Web Sites following notice of such changes shall be deemed to constitute acceptance by that User of those changes to the Privacy Policy.

Questions

If you have questions about this Notice, or would like to review or make changes to your personal information, please e-mail us at info@dlcfirm.com.

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EXHIBIT 87

Privacy Policy

Effective Date: January 1, 2020

Retail Services & Systems, Inc. and affiliated companies doing business under Total Wine & More brands and associated brands ("Total Wine," "we," "our," or "us") know that you care how information about you is used and shared, and we appreciate your trust that we will do so carefully and sensibly. This Privacy Policy lets you know what information we collect, how we may share that information, and your choices regarding the sharing of your information.

You are subject to our Terms & Conditions, which govern your access to and use of the Total Wine & More Sites (defined below). Click [Terms & Conditions](#) for more information.

Privacy Policy Table of Contents

[How to Contact Us](#)
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How to Contact Us

If you have questions about Total Wine & More's Privacy Policy, contact us by:

Phone: 1-855-330-6673

Email: privacy@totalwine.com

Mail: Total Wine & More, Store Support Center
6600 Rockledge Drive, Suite 150
Bethesda, MD 20817
Attn: Customer Care/Privacy

***Note: For California Consumer Privacy Act (CCPA) inquiries and submissions, please access our [Privacy Portal](#).

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Our Privacy Commitment

We value the relationship we have with our customers and prospective customers, and are committed to protecting the confidentiality, accuracy and integrity of your Personal Information, meaning information about you that is not publicly available. We understand the importance of keeping your information secure.

Acceptance of and Changes to this Privacy Statement

This Privacy Policy applies to Personal Information collected from and about prospective customers and customers of businesses that operate retail liquor stores under Total Wine & More brands and associated brands in various states, whether collected at a retail location (a "Store") or from the Total Wine & More website and webpages, mobile site and/or app (the "Sites").

As Total Wine continues to improve the services, products and the features we provide, this policy is subject to change. We reserve the right to amend this policy at any time by posting the amended policy on our site and updating the Effective Date at the top of this page.

By using the Total Wine site and services, you signify your acceptance of this Privacy Statement. If you do not agree with any policy described in this Privacy Statement, your sole option is to discontinue use of the Sites. Your continued use of any portion of the Total Wine site following notification or posting of such changes constitutes your acceptance of those changes. If you have questions or concerns about our specific policies, please send an e-mail to privacy@totalwine.com.

Children's and Minor's Privacy

Total Wine Stores and Sites are intended for adults 21 years of age and older. We do not knowingly collect personal information from minors under the age of 21. If you have reason to believe that a person under the age of 21 has provided Personal Information to us, please contact us as provided in the Contact Us section below with sufficient detail to enable us to delete that information from our databases.

For more information about Parental Control options, see our [Terms & Conditions](#).

Information Collection and Use

Total Wine collects, uses and discloses your Personal Information (including individuals associated with you, all of whom are referred to as "you" in this Privacy Policy) in its normal course of business for the following purposes:

- Providing you with products and services you are interested in at the Stores and their Sites;
- Fulfilling orders placed on our Sites through your selected Store;
- To determine your location so we know the closest Store to you is;
- Establishing and maintaining communications with you;
- Where you have requested information from us or one of our partners, assisting in the response to your request for information;
- Responding to your inquiries about purchases, accounts and other services;

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- Marketing our, and our affiliates and partner's or third-party delivery providers', goods and services to you;
- Processing transactions through service providers;
- Meeting legal, security, processing and regulatory requirements;
- Protecting against fraud, suspicious or other illegal activities; and
- Compiling statistics for analysis of our sites and our business.

We obtain your Personal Information from a number of possible sources:

- Directly from you. For example, during account registration from forms you complete, subscriptions you purchase or comments you provide on our Sites.
- Indirectly from you. For example, from observing your actions on our Sites.
- From third parties. For example, third party social networking providers and advertising companies, our affiliates and service providers who provide services or information to us. For example, we get updated addresses from the National Change of Address (NCOA) service to ensure we have the correct contact information for our customers.
- From publicly available sources. For example, online database searches.

Cookies & Clickstream Technology, Including Opting Out

As you navigate the Site, we may also collect information about you through the use of common information-gathering tools, such as cookies and web beacons (collectively "Website Navigational Information"). Website Navigational Information includes standard information from your web browser (such as browser type and browser language), your Internet Protocol ("IP") address, and the actions you take on the Site (such as the web pages viewed and the links clicked).

COOKIES

Like many companies, we use cookies on our Sites. Cookies are pieces of information shared between your web browser and a website. Use of cookies enables a faster and easier experience for the user.

There are different kinds of cookies with different functions:

- Session cookies: these are only stored on your computer during your web session. They are automatically deleted when the browser is closed. They usually store an anonymous session ID allowing you to browse a website without having to log in to each page. They do not collect any information from your computer.
- Persistent cookies: a persistent cookie is one stored as a file on your computer, and it remains there when you close your web browser. The cookie can be read by the website that created it when you visit that website again.
- First-party cookies: the function of this type of cookie is to retain your preferences for a particular website for the entity that owns that website. They are stored and sent between Total Wine's

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servers and your computer's operating system. They are not used for anything other than for personalization as set by you. These cookies may be either Session or Persistent cookies.

- Third-party cookies: the function of this type of cookie is to retain your interaction with a particular website for an entity that does not own that website. They are stored and sent between the Third-party's server and your computer's or device's hard drive. These cookies are usually Persistent cookies.

We do use third-party cookies on our Sites, as well as third party provided web beacons (please see the section on Web Beacons below). These cookies are used by us and our marketing partners to better understand your preferences and to tailor and improve your experience on the site based on our impressions of your interests.

More specifically, our Sites use Google Analytics and Adobe Site Catalyst, which are web analytic tools provided by Google, Inc. and Adobe Inc., respectively. These services use cookies to help our Sites analyze how users use the Sites. The information generated by the cookie about your use of the Sites (including your IP address) will be transmitted to and stored by these vendors on servers in the United States. These vendors will use this information for the purpose of evaluating your use of the Sites, compiling reports on Site activity, and providing other services relating to Site activity and internet usage for Total Wine. These vendors may also transfer this information to third parties where required to do so by law, or where such third parties process the information for the vendors for purposes of providing those services. These vendors will not associate your IP address with any other data held by them. You may refuse the use of cookies by selecting the appropriate settings on your browser. However, if you do block the use of cookies, you will not be able to use the full functionality of the Sites. By using the Sites, you consent to the processing of data about you by Google and Adobe in the manner and for the purposes set out above.

Along with the above noted uses, we use cookies for the following purposes: :

- Strictly Necessary Cookies: These cookies are essential in order to enable you to move around the Site and use its features, such as accessing secure areas of the Site. Without these cookies, services you have asked for, such as logging into your account and using a shopping cart, cannot be provided. You can set your browser to block or alert you about these cookies, but then some parts of the site will not work. These cookies do not store any personally identifiable information.
- Functional Cookies: These cookies allow our Site to remember choices you make (such as your user name, language or the region you are in) and provide enhanced, more personal or customized features. For instance, the Site needs to remember your log in details, so that you do not have to repeatedly sign in to your account when using a particular device to access our Site. The information these cookies collect is usually anonymized. They may be set by us or by third party providers whose services we have added to our pages. They do not gather any information about you that could be used for advertising or remember where you have been on the Internet.
- Performance & Analytics Cookies: These cookies collect information about how visitors use a Site, for instance which pages visitors go to most often, and if they get error messages from web pages. They also allow us to record and count the number of visitors to the Site, all of which enables us to see how visitors use the Site in order to improve the way that our Site works. These cookies do not collect information that identifies a person, as all information these cookies collect is aggregated and anonymous.

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- **Marketing & Advertising Cookies:** Total Wine does not "sell" your personal information as the word "sell" is commonly understood; in other words, we do not give your personal information to third parties in exchange for money. However, our Sites do use cookies that may be used by third parties to build a profile of your interests and show you relevant advertisements on other sites. These cookies may also be used to enable you to share pages and content that you find interesting on our Site through third party social networking and other websites. The cookies do not store directly personal information, but are based on uniquely identifying your browser and Internet device. If you do not allow these cookies, you will experience less targeted advertising and may not be able to share pages or content you find interesting through third party social networking sites.

Please Note: We embed videos or insert links to videos from YouTube on our website(s). As a result, when you visit a page with content embedded from or linked to YouTube, you may be presented with cookies from YouTube. If you opt out of advertising and marketing cookies here, YouTube may still utilize cookies for those embedded videos and links. You can control YouTube cookies by visiting <https://policies.google.com/technologies/cookies>.

For information on all of these categories of cookies, and for more information generally on cookies please refer to aboutcookies.org.

OPTING OUT OF COOKIES

There are various ways for you to manage cookies and other technologies.

Browser Settings

Through your browser settings, you can disable cookies (and other tracking tools) or request to be prompted before accepting cookies from the Sites and other websites you visit. These cookies may also permit you to delete cookies you already have. Please consult your web browser's 'Help' documentation or visit aboutcookies.org for more information about how to turn cookies on and off for your browser. If you use different browsers and computers, you will need to adjust the appropriate cookie settings for each browser and computer. Certain parts of the Site may function differently and you may not be able to use some portions of our Site if you choose to disable cookies entirely.

Third-Party Extensions

There are several browser extensions that allow you to manage cookies and personalize your browsing experience. Since these extensions are made by third party providers, Total Wine does not control these features and cannot provide technical support for these products.

Targeted Advertising Cookies

You may opt out of receiving advertising cookies from companies who are members of the Network Advertising Initiative (NAI) or who subscribe to the Digital Advertising Alliance's (DAA's) Self-Regulatory Principles for Online Behavioral Advertising. Please visit the [Network Advertising Initiative Consumer Opt-Out Page](#) or the [Digital Advertising Alliance Opt-Out Page](#) to opt out directly from providers who participate in those programs.

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WEB BEACONS

The Site may also use web beacons (including web beacons supplied or provided by third parties) alone or in conjunction with cookies to compile information about users' usage of the Site and interaction with e-mails from Total Wine. Web beacons are transparent electronic images that can recognize certain types of information on your computer, such as cookies, when you view a particular Site tied to the web beacon, and a description of a Site tied to the web beacon. We use web beacons to operate and improve the Sites and e-mail communications. We may use information from web beacons in combination with other data we have about our customers to provide you with information about Total Wine and our services. We will conduct this review on an anonymous basis.

IP ADDRESSES

When you visit our Sites, Total Wine collects your Internet Protocol ("IP") addresses to track and aggregate non-Personal Information. For example, Total Wine uses IP addresses to monitor the regions from which users navigate the Sites. IP addresses will be stored in such a way so that you cannot be identified from the IP address. In addition, Total Wine uses your IP address to get an approximate location so we can find a store closest to you. We do this for both your convenience, as well as for legal compliance reasons.

DO-NOT-TRACK

The major internet browsers have attempted to implement the draft "Do Not Track" ("DNT") standard of the World Wide Web Consortium ("W3C") in their latest releases. As this standard has not been finalized, Total Wine's Sites are not compatible with DNT.

Security of Your Personal Information

Whether you are shopping online or in our stores, we use reasonable security measures to protect the confidentiality of personal information under our control and appropriately limit access to it. The Total Wine Sites use Transport Layer Security (TLS) or equivalent encryption technologies to protect your personal information during data transport, including your name, address and credit card number. However, no security controls are failproof, and Total Wine cannot completely ensure or warrant the security of your personal information. We therefore urge you to always use caution when transmitting information over the Internet.

When you create an account on TotalWine.com you are required to establish a password between 7 and 16 characters with at least one letter and one number. Your password may not contain your first name, last name, or any spaces. You are solely responsible for maintaining the secrecy of your password and account information. We strongly recommend that you do not share this information with others. You have the ability to purchase on our site without creating an account; however, you will need to reenter your personal information each time you use our site in order to make a purchase.

Disclosure of Personal Information

We do not disclose any Personal Information about you to others except as stated in this Privacy Policy, as otherwise permitted by law, or authorized by you. This Privacy Policy does not apply to privacy practices of third parties that we do not own or control, including but not limited to any third party websites, services, applications, online resources to which the Sites may link, embed, reference, or otherwise provide access through the Sites. We are not responsible for the privacy practices or the

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content of such third party sites. Please contact these third parties directly for information regarding their privacy practices.

SERVICE PROVIDERS

We use third-party service providers to enhance your consumer experience. This may include, for instance, providers who assist us with tech or customer support, operations, web or data hosting, billing, credit card processing, accounting, security, marketing, data management, validation, enhancement or hygiene, or otherwise help us to provide, develop, maintain and improve our services. These companies may use information about your visits to our Sites in order to help process delivery orders, provide personalized recommendations and advertisements about our goods and services on our Sites as well as when you visit other websites. Because service providers we use may be located in the United States, your Personal Information may be processed and stored inside the United States; and the U.S. government, courts, or law enforcement or regulatory agencies may be able to obtain disclosure of your Personal Information under U.S. laws.

THIRD PARTIES

Some areas in our site may be offered to you in association with affiliated or non-affiliated third parties, such as co-promotional partners, dedicated producers of drinks, or co-sponsors of events you may want to attend. Such co-branded areas may require you to disclose Personal Information to the third party. The co-branded areas will identify the third party; however, the third party's privacy policy will apply to how they treat your Personal Information. We recommend you review the privacy policy of these third parties. If you elect to register for events or products with these third parties you will be providing your Personal Information to both us, and the third party.

Parts of the Sites use YouTube API Services to provide access to Total Wine's YouTube channel. You acknowledge and agree to be bound by the YouTube Terms of Service (<https://www.youtube.com/t/terms>) and Google's Privacy Policy (<http://www.google.com/policies/privacy>) when engaging YouTube content and services through the Sites. You may manage your YouTube API data by visiting Google's security settings page at: <https://security.google.com/settings/security/permissions>.

SOCIAL MEDIA, REVIEWS, AND USER GENERATED CONTENT

Any personally identifiable information you submit on a social media website, such as Facebook or Twitter, bulletin board, blog, chat room, comment about a product, or any other public forum on our Sites, can be read, collected or used by other users of these forums, and could be used to send you unsolicited messages. We recommend that you do not provide your name, e-mail address or any other personal information in public forums on this Site. Please note that if you choose to do so, it is at your own risk and you accept full responsibility for those posts and any consequences that may arise from posting this information.

BUSINESS TRANSACTIONS

As we continue to develop our businesses, we might sell or buy assets. In such transactions, user information, including Personal Information, generally is one of the transferred business assets. Also, either Total Wine itself or substantially all of Total Wine assets were acquired, your Personal Information may be one of the transferred assets. Therefore, we may disclose and/or transfer your Personal Information to a third party purchaser in these circumstances.

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OTHER LEGALLY REQUIRED DISCLOSURES

Total Wine preserves the right to disclose without your prior permission any Personal Information about you or your use of this Site if Total Wine has a good faith belief that such action is necessary to: (a) protect and defend the rights, property or safety of Total Wine, employees, other users of this Site, or the public; (b) enforce the terms and conditions that apply to use of this Site; (c) as required by a legally valid request from a competent governmental authority; or (d) respond to claims that any content violates the rights of third-parties. We may also disclose Personal Information as we deem necessary to satisfy any applicable law, regulation, legal process or governmental request.

In this Privacy Policy, the purposes identified above and in "Collection, Use and Disclosure of Personal Information" will be referred to as the "Identified Purposes."

Updating Your Personal Information

Total Wine wants your personal information to be accurate and complete. We provide several different methods for you to update your personal information. To update your name, address, phone number and/or e-mail information:

[Login to My Account on TotalWine.com](#) to update your personal account information (if you've created an account on TotalWine.com)

Phone: 1-855-330-6673

Email: privacy@totalwine.com

Mail: Total Wine & More, Store Support Center
6600 Rockledge Drive, Suite 150
Bethesda, MD 20817
Attn: Customer Care/Privacy

If you send an e-mail or letter request, please be sure to include your current information and the requested changes.

E-mail & Account Registration

During registration on the Sites, we collect an e-mail address to communicate with you about your transaction. We use this e-mail address to contact you if there are any issues and to notify you about the status of your order. If you do not want this retained for future promotional e-mail inclusion, we provide you the ability to opt-out.

If a user wishes to subscribe to our e-mails, we ask for contact information such as name, preferred store and e-mail address. We may use your personal information for purposes other than sending you promotional materials. For example, we may use your information to send you administrative communications about any account you may have with us or about future changes to this Privacy Policy. If at any time you should wish to unsubscribe, please click on the "unsubscribe" link in any e-mail from us or send an e-mail to privacy@totalwine.com.

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When you register as a member of the Sites or sign up to receive our e-mail offers, we collect information that helps us identify you. The more information you provide, the better we can customize our services and your experience to suit your needs and preferences.

Nevada Privacy Notice

Nevada law (SB 220) requires website operators to provide a way for Nevada consumers to opt out of the sale of certain information that the website operator may collect about them. Total Wine does not sell your personal information to third parties as defined in Nevada law, and will not do so in the future without providing you with notice and an opportunity to opt-out of such sale as required by law. See above for more information about how you can protect your information, and what we do to protect your information.

California Privacy Notice

[See California Privacy Notice here.](#)

Total Wine® & MORE

Contact Customer Care

+ 1 (855) 328-9463

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EXHIBIT 88



NASDAQ, INC., AND AFFILIATED COMPANIES PRIVACY POLICY

Effective Date: May 25, 2018

As a global financial services and technology provider and self-regulatory organization, Nasdaq is committed to protecting Personal Information and complying with applicable privacy requirements in a trustworthy, transparent and responsible manner.

This Privacy Policy describes how Nasdaq, Inc. and its subsidiaries and affiliates (collectively, "Nasdaq," "we," "our" or "us") collects, uses and discloses Personal Information about individuals (collectively, "users" or "you") receiving our products and services, exploring or maintaining a business relationship with us (either directly or through an intermediary such as your financial services provider, your appointed legal or other representative or your employer) and/or using our websites or online features (each a "Site" or collectively, our "Sites"). As used in this Privacy Policy, Personal Information means any information relating to an identified or identifiable natural person; Personal Information is intended to cover all information subject to personal data processing and privacy laws applicable to our business.

Without limiting the generality of the preceding paragraph, this Privacy Policy applies to all Personal Information provided to Nasdaq's European exchanges (namely, Nasdaq Copenhagen A/S, Nasdaq Helsinki Ltd, Nasdaq Iceland hf., Nasdaq Oslo A/S, Nasdaq Riga AS, Nasdaq Stockholm AB, Nasdaq Tallinn AS and AB Nasdaq Vilnius), the clearinghouse Nasdaq Clearing AB, central shares depositories (namely, Nasdaq CSD SE and Nasdaq CSD Iceland hf.), AB Pensionkeskus, and the broker-dealer/investment firm Nasdaq Broker Services AB (collectively, our "EEA Regulated Entities") subject only to the [exclusions](#) from this policy set forth below.

The Privacy Policy also describes your rights, where applicable, and how to exercise them. You may contact us at any time with questions related to our Personal Information processing and privacy via email at privacy@nasdaq.com.

In some instances, we may post or provide materials that provide further description of Personal Information processing related to certain products and services. We may also post information about how we comply with specific Personal Information laws or regulations like European Union or United States privacy laws. Such materials are for informational purposes only and are not intended as an exhaustive listing of Personal Information processing related to the product and service. The materials should not be construed as modifying this Privacy Policy.

BRIEF OVERVIEW

Information about how this policy applies to our global company

Nasdaq has endeavored to develop a Privacy Policy that can be applied consistently across its global organization; however, certain elements are limited to situations where applicable law requires them. With respect to your Personal Information, the data controller will be the Nasdaq entity delivering products and services or with whom you are interacting. Click [here](#) to learn more.

Situations where this Privacy Policy does not apply

This Privacy Policy does not apply to the extent that other Personal Information processing or privacy terms are set forth in the applicable contract for Nasdaq's products or services, posted on a Site or in certain other situations. Click [here](#) to learn more

Information we collect about you	We may collect Personal Information and Device Information (defined below) (collectively, "information") about you in connection with your (or your employer's) receipt of products or services including to fulfill our contractual obligations or establish or maintain a business relationship with us; your registration, use, purchase, or inquiries on or about our Sites that link to this Privacy Policy; the pursuit of our legitimate business interests; and/or, to comply with applicable law. Click here to learn more.
How we use your information	We may use your information to provide services; respond to inquiries and provide customer support and technical assistance; communicate with you; process transactions; improve, develop, provide content for, operate, deliver and market our products, service or Sites; implement social networking features; comply with our company policies and procedures and with applicable law; ensure proper and authorized use of the Sites; perform Site tracking and analysis; and, as otherwise permitted by applicable law. Click here to learn more. Click here to learn more.
Automated decision-making	We do not process Personal Information for automated decision making in a manner that has legal or similarly significant effects on the individual. Click here to learn more.
How we share your information	We may share your information with our business units, affiliates, subsidiaries, business partners, customers/members, service providers and/or your representatives, when we believe necessary to protect or enforce our rights or the rights of another user, and as otherwise permitted by law. We do not sell or share information with third parties so that they can independently market their own products or services to you, unless we have explicitly given you the option to opt-in such disclosures. Click here to learn more.
Your Rights Regarding Your Personal Information	We provide you with the opportunity to be informed of whether we are processing your information and to access, correct, update, oppose, delete, block, limit or object, upon request and free of charge, to our use of your Personal Information to the extent required by applicable law. Click here to learn more.
Security of Your Information	We maintain commercially-reasonable technical, administrative and physical security measures to protect your information. Click here to learn more.
International Transfers	We may transfer your information outside of your home country. To protect such information, any such international transfers will be made in accordance with applicable law. Click here to learn more.
Our Retention of Your Information	We retain your information to fulfill the purpose for which it was collected, comply with record retention requirements that apply to our business and where required to address legal or compliance matters affecting the information. Click here to learn more.
Cookies and similar Technologies	We may use cookies and similar technologies to help deliver our products, services and Sites, offer you a more personalized user experience and market products and services to you. Click here to learn more.
Marketing Communications	You can opt out of receiving marketing communications from us. Click here to learn more.

Referrals	If you choose to refer an individual about our products or services, to explore a business relationship with us or to use our Sites, we will ask you for the individual's name and email address for us to send your friend a one-time email to invite him/her to access the specific Site. Click here to learn more.
Links to Other Websites	Our Sites may contain links to other websites or services that are not owned or controlled by Nasdaq, including links to websites of our advertisers, sponsors and partners. Click here to learn more.
Use of Sites by Children	Our Sites are not intended for use by children under the age of sixteen. Click here to learn more.
Changes to this Privacy Policy	You will be notified about any material changes to this Privacy Policy via a posting on our Sites, and as otherwise required by applicable law. Click here to learn more.
Contact Us	If you have questions about this Privacy Policy or wish to exercise your rights regarding Personal Information, please contact us at privacy@nasdaq.com or one of the other points of contact listed in this Privacy Policy. You may also contact our Data Protection Official for our EEA Regulated Entities and the Data Protection Authority. Click here to learn more.

INFORMATION ABOUT HOW THIS POLICY APPLIES TO OUR GLOBAL COMPANY

As a global organization, different Nasdaq entities, products/services and Sites may be subject to different privacy laws based on where our entity operates, where the products/services are delivered and/or where you are located. For example, the European Union General Data Protection Regulation imposes certain requirements on some Nasdaq entities or services that are not applicable to all of our entities or services. Where this Privacy Policy states that a provision applies "to the extent required by applicable law," such provision will be applicable only to the extent that Nasdaq is subject to legal requirements imposing it.

For purposes of data protection laws, except where this Privacy Policy does not apply, as described below, the Nasdaq entity that will be the "controller" of your Personal Information will be the entity that delivers the products or services you (or the company for whom you are working or have a business relationship) are receiving or maintains the Site that you are using. You can identify the Nasdaq company that hosts a particular Site through the Site's footer or "About" link. A list of Nasdaq's different business locations is available at this site:

<https://business.nasdaq.com/discover/nasdaq-locations/index.html>.

Although your data controller may be a specific Nasdaq entity, contact and other customer relationship information that we collect may be held in a customer relationship management or contact database which can be accessed by other Nasdaq entities which may be located globally; further information about [international transfers](#) of information is provided below. To the extent required or permitted by applicable law, by visiting or using our Sites, you are consenting to us collecting and processing information about you in accordance with this Privacy Policy.

SITUATIONS WHERE THIS PRIVACY POLICY DOES NOT APPLY

This Privacy Policy also does not apply to Personal Information processed in connection with delivery of services to Nasdaq by suppliers or contractors; such relationships are governed solely by the Personal Information processing terms and conditions between Nasdaq and the supplier/contractor. It also does not apply to job applicants or employees, which are subject to relevant privacy notices.

This Privacy Policy does not apply to the extent that:

- Nasdaq's contract for delivery of products or service prescribes different Personal Information terms and conditions for the processing of your information;
- Nasdaq is delivering products or services as a data processor in which the contractual terms and conditions between Nasdaq and the

controller/contracting party shall govern;

- The Site for the products or services sets forth an additional or alternative Privacy Policy; or
- Applicable law imposes different processing or privacy requirements on your information.

INFORMATION WE COLLECT FROM YOU OR YOUR REPRESENTATIVE

We only collect information from you/your representative or about you that is reasonably necessary for us to provide the relevant product or service, business relationship and/or communication consistent with the nature of such product, service, business relationship and/or communication. Based on the specific products, services, business relationship or Sites involved as well as requirements under applicable law, we may collect the following categories of personal information ("Personal Information") that you or your representative (such as your employer, financial services provider, legal representative, company where you are an officer, director or significant shareholder) provide to us:

- Name;
- Email address;
- Social media username;
- Telephone number;
- Mailing address;
- Company;
- Title;
- Business contact information;
- Employment, company officer or director, or shareholder status;
- Tax or National Identification Number;
- Date of birth;
- Trader identification, client identification or trading "short code";
- Career or professional history and educational background;
- Financial holdings information;
- Your recorded voice (where you are advised in advance of the recording);
- Photograph;
- Payment information (e.g., bank account or credit card number);
- Username and password;
- Passport or government issued identification information (such as for security purposes when visiting our facilities); and
- Any other Personal Information you or your representative volunteers on or provides access to via any or our Sites and/or any Nasdaq community forum, social media offering or blog.

We may also automatically collect the following categories of information from devices (e.g., mobile, computer, laptop, tablet) used to visit or use our Sites ("Device Information"):

- IP address;
- Device identifier;
- Log files;
- Cookies;
- Clear gifs;
- Flash LSOs; and
- Other information as described in our Cookies Policy (Click [\[here\]](#) to view our Cookies Policy).

collectively referred to as "information."

INFORMATION THAT WE COLLECT ABOUT YOU

Based on the specific products, services, business relationship or Sites involved (as well as requirements under applicable law), we may collect the following categories of Personal Information on our own or from third parties about you in accordance with applicable law:

- Information about you available in news feeds, exchange data feeds and other public data sources (including the public internet);
- Information provided by relevant regulators, government agencies and non-government credentialing or professional organizations;
- Information related to your status under economic sanctions, anti-money laundering and similar laws or other information that may impact our ability to engage in business with you or a company at which you are an employee, officer or director or significant shareholder;
- Information that you, your employer or other representative makes publicly available via your personal or company website or in social media profiles;
- Information related to your professional activities (such as consulting to public retirement funds) that is contained in documents released by a governmental body under Freedom of Information Act, Open Government License or similar laws and regulations;
- Information from event organizers for events that you have attended;
- Information from companies providing professional contact information to their customers/subscribers; and
- Other Personal Information to the extent permitted by applicable law and reasonably necessary for the performance of our business obligations, compliance with laws applicable to our business or pursuit of our legitimate business interests.

HOW WE USE YOUR INFORMATION

The following is an overview of Nasdaq's purposes for processing Personal Information. Often due to the nature of the product or service involved or the context in which the Personal Information is used, it will be apparent how we intend to use the information. Additional information about processing related to a particular product or service may be separately posted on the relevant Site or contained in the applicable terms and conditions.

We may use the information we collect for the purposes identified below. To the extent required by applicable law, each purpose for the processing of Personal Information is substantiated by one or more lawful bases for processing. Unless otherwise identified with respect to a particular product or service, our processing is done based of one or more of the following:

Purpose of Processing	Bases for Processing
Provide you (or your employer/represented company) with our services and products and communicate with you about your (or your employer/represented company) accounts or use of our products, services and/or Sites	<ul style="list-style-type: none"> • Perform or enter into a contract • Legitimate business interests • Comply with a legal obligation • Consent
Process transactions through one of our services including, but not limited to, processing financial transactions initiated by you or your representative	<ul style="list-style-type: none"> • Perform or enter into a contract • Comply with a legal obligation
Comply with our obligations as an exchange, clearinghouse, broker-dealer, central shares depository, pension system administrator and/or other regulated/licensed business including, but not limited to regulations applicable to our EEA Regulated Entities such as, for example, the Markets in Financial Instruments Regulation	<ul style="list-style-type: none"> • Perform or enter into a contract • Comply with a legal obligation
Perform transaction and regulatory reporting requirements under applicable law	<ul style="list-style-type: none"> • Perform or enter into a contract • Comply with a legal obligation

Perform our obligations as a Self-Regulatory Organization, trading venue and/or market operator including, but not limited to, conducting surveillance of issuers and trading activities, conducting disciplinary proceedings and reporting suspected to misconduct to regulators and other authorities	<ul style="list-style-type: none">• Perform or enter into a contract• Legitimate business interests• Comply with a legal obligation
Monitor for security threats and fraud involving the use of our products, services, Sites or physical facilities	<ul style="list-style-type: none">• Legitimate business interests• Comply with a legal obligation
Maintain your status as a representative of an exchange or clearinghouse member or certified advisor to issuers	<ul style="list-style-type: none">• Perform or enter into a contract• Comply with a legal obligation
Register or establish an account for you (or the company for whom you are an employee, officer or director) as a customer	<ul style="list-style-type: none">• Perform or enter into a contract• Legitimate business interests• Comply with a legal obligation
Register you (or your employer/represented company) to receive services or information through one or more of our Sites	<ul style="list-style-type: none">• Perform or enter into a contract• Consent
To the extent permitted by applicable law, identify you (or your employer/represented company) as a prospective customer for products or services and provide you with relevant information and/or invitations to events	<ul style="list-style-type: none">• Legitimate business interest• Consent
Manage our relationship with you (or your employer/represented company) as a customer, business prospect and/or information recipient	<ul style="list-style-type: none">• Perform or enter into a contract• Legitimate business interest• Consent
To pursue or enforce our legal rights related to our business, products, services or Sites and/or defend against claims made against us	<ul style="list-style-type: none">• Perform or enter into a contract• Legitimate business interest
Communicate with you (or your employer/represented company) about your account or use of our products, services or Sites	<ul style="list-style-type: none">• Legitimate business interest• Consent
Create informational materials and statistical extracts for our products and services	<ul style="list-style-type: none">• Perform or enter into a contract• Legitimate business interest• Consent
Develop, provide content for, operate, deliver, and market our services and Sites	<ul style="list-style-type: none">• Perform or enter into a contract• Legitimate business interest• Consent

Improve the quality of our Sites and tailor them to your preferences

- Legitimate business interest
- Consent

Implement social networking features you have activated (e.g., Facebook "Like" button and LinkedIn integration)

- Consent

With respect to situations where we process Personal Information based on our legitimate business interest, reflecting that we are generally a business-to-business product and service provider, we typically collect and process limited Personal Information about corporate customer points of contact and individuals acting in their professional capacities as part of our overall effort to reduce the privacy impact on individuals. To the extent required by applicable law, you have the right to object to the processing of your personal data based on a legitimate interest as legal basis. Please see the section below regarding [your rights](#) to find out more. Where processing is based on your consent, you have the right to withdraw that consent at any time.

We also use your information for compliance with our company policies and procedures, for accounting and financial purposes, and otherwise as required or permitted by applicable law. If you do not provide us with information as described above, we may not be able to fulfill the applicable purpose of collection, such as completing a contemplated transaction, responding to your queries or providing access to our Sites to you.

AUTOMATED DECISION-MAKING

Nasdaq does not engage decision-making based solely on automated processing, including profiling, which produces legal effects concerning an individual or similarly significantly affects an individual.

As part of Nasdaq's surveillance programs for its exchanges, we utilize certain software that uses machine intelligence and learning to identify situations that potentially constitute market abuse, insider trading, fraud or violations of our published rules. Such software relies on identifying patterns indicating misconduct based on past activity. The conduct involved may include conduct by a corporate member, trading algorithm or individual action. Alerts are referred for investigation by our Surveillance team which determines which actions to take based on our published rules and applicable law.

HOW WE SHARE YOUR INFORMATION

From time to time, to the extent permitted by applicable law and subject to any contractual limitations on sharing Personal Information set forth in a relevant contract for products and services, we may share your information with our affiliates, subsidiaries, business partners, customers/members (such as where we process your Personal Information in connection with your role with your employer or financial services provider), third party service providers and authorities in the following circumstances:

- Nasdaq Business Units, Affiliates, Subsidiaries, Business Partners and Customers. We may share your information with our business units, affiliates, subsidiaries, business partners, and customers in the US and worldwide for purposes identified above. A list of Nasdaq's offices by country is posted at: <https://business.nasdaq.com/discover/contact-us/index.html>. To the extent required or permitted by applicable law, by visiting or using our Sites or otherwise providing us with your information, you consent to this sharing of your information. Where such consent exists, to opt-out of such sharing, please contact us via email at privacy@nasdaq.com or at the location in the Contact Us section below.
- Service Providers. We may share your information with third parties who perform functions on our behalf (e.g., hosting or operating our services or Sites, processing credit card payments, sending email marketing communications, or data analysis). We do not authorize these third parties to use your information for purposes other than for which it has been provided, and do not authorize these third parties to disclose that information to unauthorized parties. We require these third parties to maintain appropriate security to protect your information from unauthorized access or processing.
- As Required or Appropriate by Law. We may disclose your information to regulatory authorities, courts, and government agencies where we believe that doing so would be in accordance with or permitted or required by any applicable law, regulation or legal process, to defend the interests, rights, and/or property of Nasdaq or others, or to respond to emergencies.
- Business Transfers. We may transfer your information to a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, brands, affiliates, subsidiaries or other assets. To the extent permitted by

applicable law, we may share information with a prospective buyer or transferee of the business as part of the diligence process provided that we require any such third party to maintain the confidentiality of your information and protect it with appropriate technical and organizational security measures.

We may share your information with other parties as directed by you or subject to your consent. We may also share and otherwise process aggregated information or de-identified information that does not identify you individually with other parties. For example, from time to time, we may utilize survey information collected from you on an aggregate, not individually identifiable, basis. We also use this aggregated or de-identified information for our various business purposes, including the creation and sale of other products and services to our clients and potential clients. This aggregate or de-identified information is not traceable to any particular client or user and will not be used by a third party to contact you.

We do not share, sell, rent or trade your information to our service providers or business partners for their own direct marketing purposes, unless we have explicitly given you the option to opt-in or opt-out of such disclosures.

MARKETING COMMUNICATIONS

We process Personal Information within the scope of our marketing and market segmentation. With market segmentation, we mean that we categorize our customer base based on professional affiliations and functions, alignment with our services and products and information gathered from public sources of information. For customers or users of our Sites, we may also use information gathered from your use of our products, services and/or Sites for marketing purposes. You always have right to request that we stop using your personal data for direct marketing purposes.

To the extent required by applicable law, you have the right to object to the processing of your personal data based on a legitimate interest as legal basis. You also always have the right to withdraw your consent at any time when we need your consent in order to process your personal data. If you withdraw your consent, you will no longer receive information and offers that are tailored for you. Please see the section [below](#) for more information about your rights.

If you no longer wish to receive marketing communications from us, you may opt-out of receiving marketing-related emails by: (1) using the unsubscribe method provided in our communications; (2) if you created an online account when you registered to receive our emails, you may log-in to your account on the applicable Site and make changes to your communication preferences; or (3) you can opt out by updating your preferences in the Email Alert section of our Sites. In particular, you have the right to object our use of your personal information for direct marketing and in certain other situations (in accordance with applicable law) by contacting us at privacy@nasdaq.com. If you are having difficulty unsubscribing from our email marketing communications using the above methods, please contact us as at privacy@nasdaq.com.

We will try to comply with your request as soon as reasonably practicable as required by applicable law. Please note that we may need to retain certain information for recordkeeping purposes, to complete any transactions that you began prior to your request, or for other purposes as required or permitted by applicable law. In addition, please note that even if you opt-out of receiving marketing communications from one or all of our Sites, we may need to send you service-related communications.

YOUR RIGHTS REGARDING YOUR PERSONAL INFORMATION

To the extent required by applicable law, in our capacity as the controller of your Personal Information, we will also provide you with the opportunity to be informed of whether we are processing your Personal Information and at any time to access, correct, update, oppose, delete, block, limit or object to our use of your Personal Information. The foregoing rights will be afforded to you free of charge (except to the extent that your requests are manifestly unfounded or excessive, in which case, we may charge an administrative fee or refuse to meet your request). Please note that legal obligations that apply to our business – for example, financial regulations that apply to our EEA Regulated Business - may prevent us from immediately deleting parts of your information. To exercise your rights, please contact us as detailed under the Contact Us heading below.

To prevent fraudulent activity, we may require you to authenticate your identity when you contact us. We will try to comply with your request as soon as reasonably practicable and within timeframes required by applicable law. Please note that in some instances, due to the nature of the information that we receive, we may require you to provide additional information that will help us identify which information is yours. For requests subject to the European General Data Protection Regulation, we will respond to your request within one month of our receipt of it. We may extend this period by two further months taking into account the complexity of your request or the number of requests that we have received; we will inform you of any such extension within one month of receiving your request along with the reasons for the delay and information about your right to file a complaint with the supervisory authority.

The following sets out a summary of your rights to the extent that your Personal Information is processed subject to the European General Data Protection Regulation:

- Right to access, rectification, erasure and restriction of processing. You have the right to request:
 - [Access to your personal data](#). This means that you have the right to request information on our use of your Personal Information. You also have

the right to request a copy of the Personal Information being processed at no cost. However, we may charge you a reasonable administrative fee to provide you with additional copies of the Personal Information. If you make your access request by electronic means such as email, we will provide you with the information in a commonly used electronic format.

- Rectification of your personal data. We will at your request, or at our own initiative, rectify, anonymise, erase or complement Personal Information that you or we discover is inaccurate, incomplete or misleading. You also have the right to complete the Personal Information with additional data if relevant information is missing.
- Erasure of your personal data. You have the right to request that we erase your Personal Information if we do no longer have an acceptable reason for processing the data. Given this, erasure shall be made by us if:
 - the Personal Information is no longer necessary for the purposes for which it was collected,
 - we use your Personal Information with your consent and you withdraw your consent,
 - you object to the processing of your Personal Information based on our legitimate interest and there is no overriding legitimate ground for the processing,
 - the Personal Information has not been lawfully processed,
 - we are required to erase the Personal Information due to a legal obligation, or
 - you are a child and we have collected the personal data in relation to the offer of information society services.

However, there might be requirements under applicable law, or other compelling reasons, that prevents us from immediately erasing your Personal Information. In such case, we will stop using your Personal Information for any other reasons than to comply with the applicable law, or the relevant compelling reason.

- Right to restrict processing: This means that we temporarily restrict the processing of your Personal Information. You have the right to request restriction of the processing when:
 - you have requested rectification of your personal data in accordance with this Privacy Policy, during the period of time we are verifying the accuracy of the data,
 - the processing is unlawful and you do not want the Personal Information to be erased,
 - as data controller, we no longer need the Personal Information for the purposes for which it was collected, but you require us to retain the information for the establishment, exercise or defence of legal claims, or
 - you have objected to our legitimate interest for the processing in accordance with this Privacy Policy, during the period of time we determine whether the legitimate interest overrides your privacy rights.

We will take all reasonable and possible actions to notify any recipients of your Personal Information regarding any rectification, erasure or restrictions carried out by us. At your request, we will also inform you with which third parties we have shared your Personal Information.

- Right to object to processing. You have the right to object to the processing of your Personal Information based on our legitimate interest. If you object to such processing, we will only continue with the processing if we have a compelling legitimate reason for the processing that outweighs your interest, rights or freedoms, or if continued processing is necessary for the establishment, exercise or defence of a legal claim.
- Right to portability. You have the right to receive certain of your Personal Information in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller. You only have this right when your personal data is processed by automated means and our legal basis for the processing is performance of a contract between you and us.
- Right to lodge a complaint. You have the right to lodge any complaints regarding our processing of your personal data with the supervisory authority.

SECURITY OF YOUR INFORMATION

We take reasonable technical, administrative and physical security measures to protect your information, including applying generally accepted industry standards to protect the information submitted to us during transmission and once we receive it. However, no method of transmission over the Internet, or method of electronic storage is 100% secure, so we unfortunately cannot guarantee absolute security. If you have reason to believe that your interaction with us is no longer secure (e.g., if you feel that the security of any account you might have with us has been compromised), please contact us immediately as detailed under the "Contact Us" heading below.

INTERNATIONAL TRANSFERS

Some of the parties with which we may share your information, as detailed in “[How We Share Your Information](#)”, may be located in countries that do not provide an equivalent level of protection as your home country. Where required, Nasdaq has implemented appropriate cross-border transfer solutions to provide adequate protection for transfers of certain personal information, including, but not limited to, the European Commission’s Standard Contractual Clauses (available at https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_en). To the extent permitted by applicable law, by using our Sites, and providing us information about you, you consent to the international transfer of information about you to the above parties.

RETENTION OF YOUR INFORMATION

We will retain your information for the period necessary to fulfill the purposes outlined in this Privacy Policy and as otherwise needed to comply with applicable law and recordkeeping requirements or to address any complaints, challenges, legal or compliance matters related to the information.

COOKIES AND SIMILAR TECHNOLOGIES

When you use our Sites, we along with our affiliates, subsidiaries and third party service providers may use “cookies” and similar technologies (e.g., log files, clear gifs, pixel tags and Flash LSOs) (collectively, “technology”). This technology may involve placing small files/code on your device or browser that serve a number of purposes, such as remembering your preferences (e.g., language) and generally improving your experience on our Sites. Specifically, we may use such technology for purposes such as to:

- Provide us with general analytics about our Sites, including demographic information in a non-identifiable form, in order to improve our Sites’ performance and customize users’ experience;
- Enable us to help you make better use of our services or Sites such as by suggesting how you can improve your use of different features or functionality or help address technical issues that you encounter in using our services or Sites;
- Support security measures, such as requiring re-login into your account or additional authentication when using a new device to access our Sites;
- Measure the success of our marketing campaigns and compile statistics about the Site’s usage and email response rates;
- Allow you to engage in our social media offerings on our Sites (e.g., Facebook “Like” button and LinkedIn integration); and
- More effectively market our Sites and advertise other Sites that may be of interest to you.

To learn more about the technology used on our Sites and how to disable some of the technology, visit our more comprehensive [Cookie Statement](#).

REFERRALS

If you choose to use our referral service to tell someone about our products or services or Sites, we will ask you for your friend’s name and email address. We will send your referral a one-time email to invite him/her to access the Site or with information about the product or service, and store his/her email address for the sole purpose of sending this one-time email and tracking the success of our referral program. Your referral may contact us as detailed under the “Contact Us” heading below to request we remove this information from our database.

LINKS TO OTHER WEBSITES

Our Sites may contain links to other websites or services that are not owned or controlled by Nasdaq, including links to websites of our advertisers, sponsors and partners. This Privacy Policy only applies to information collected by our Sites. We have no control over these third party websites, and your use of third party websites and features are subject to privacy policies posted on those websites. We are not responsible or liable for the privacy or business practices of any third party websites linked to our Sites. Your use of third parties’ websites linked to our Sites is at your own risk, so we encourage you to read the privacy policies of any linked third party websites when you leave one of our Sites.

We may use third party payment services to process purchases made through the Sites. If such service is made available and you wish to make a purchase through the Site, your Personal Information may be collected by the third party (and not by us). In that case, the information you provide to the third party will be subject to that third party's privacy policy and not this Privacy Policy.

USE OF SITES BY CHILDREN

None of our Sites are targeted for use by children under the age of sixteen. We do not target any of our products or services or Site content/features for use by children of such age.

CHANGES TO THIS PRIVACY POLICY

Except to the extent limited by applicable law, we reserve the right to update this Privacy Policy to reflect changes to our information practices by prominently posting notice of the update on our Sites. Unless otherwise noted, any updates will become effective 30 days after posting the updates to the Privacy Policy, and apply to all information collected about you. If we make any changes to this Privacy Policy that materially impact previously collected information about you, we will, to the extent that we have your email address, notify you by email.

CONTACT US

If you have any questions about this Privacy Policy or information we have collected about you, please contact us by email at privacy@nasdaq.com or by postal mail at:

Office of General Counsel – Privacy Team
Nasdaq, Inc.
805 King Farm Blvd
First Floor
Rockville, MD 20850

Office of General Counsel – Stockholm Office
Tullvaktsvägen 15,
10578 Stockholm
Sweden

For our EEA Regulated Entities, you may also contact our Data Protection Officer:

Advokatfirman Lindahl KB,
Box 1065,
101 39 Stockholm,
Sweden
Att: Caroline Olstedt Carlström – Nasdaq Data Protection Officer

With respect to Personal Information processing subject to European Union jurisdiction, in addition to contacting our business contacts and Data Protection Officer (for our EEA Regulated Businesses), you may also contact a data protection supervisory authority. Within Europe, Nasdaq's headquarters is located in Sweden, making the responsible data protection supervisory authority:

The Swedish Data Protection Authority

Contact details:

Telefon: 08-657 61 00
E-post: datainspektionen@datainspektionen.se
Fax: 08-652 86 52

Postadress:
Datainspektionen
Box 8114
104 20 Stockholm

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LAST MODIFIED: AUGUST 21, 2020

Privacy Policy

At AccuWeather, We want to assure that We provide You, as a User, with information and choice about Our policies and practices. We do this so You may make informed decisions whether or not You want to use AccuWeather Sites and how you choose to use them.

Please read this Privacy Policy carefully before using AccuWeather Sites. When You use AccuWeather Sites, You consent to the terms and conditions and the practices described in this Privacy Policy. It applies to You if You access AccuWeather Sites directly, through a third-party or by other means. It takes precedence over any conflicting terms published by a third party regarding Your access or use of AccuWeather Sites.

As AccuWeather expands its offerings and as technology evolves, We may, from time to time, update Our privacy practices to address these changes. We encourage You to check here on a regular basis for updates to this Privacy Policy.

ACCUWEATHER SITES, AND THE PRODUCTS, SERVICES AND ADVERTISING MADE AVAILABLE THROUGH THEM, ARE NOT INTENDED FOR USE BY CHILDREN UNDER THE AGE OF 18 WITHOUT PARENTAL SUPERVISION. AccuWeather does not intentionally collect any information from children under 18 years of age. We will undertake to delete any details from such users where a parent or guardian has notified us that any such details have been obtained.

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DEFINITIONS WE USE IN THIS PRIVACY POLICY

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"AccuWeather," "We," "Our," and "Us" refers to AccuWeather, Inc. and any and all entities that are controlled by or under common control with AccuWeather, Inc.

"AccuWeather Sites" include but are not limited to all AccuWeather wired and mobile websites, digital products, services, websites, applications, data, content, advertising, and other elements. These other elements may include sign-up screens, contests, data input and tracking, and other interfaces.

"Online Behavioral Advertising," also referred to as "OBA," which is also sometimes called "interest-based advertising," uses information collected across multiple web sites that You visit in order to predict Your preferences and to show You advertisements that are most likely to be of interest to You.

"Personally Identifiable Information" or "PII" means information by which a natural person can be specifically identified. This information includes things such name, address and email address. Your username and a password You supply are examples of PII. Information about a device or the location of a device may be PII, but only if We also have other information that, when combined with information about that device, might lead to identification of You or another natural person.

"Providers," refers to non-AccuWeather entities such as, but not limited to, service providers, advertisers, vendors, data collection services and other third parties. These Providers may also collect information about You.

"User," "You," "Your," and "Visitor," whether in the singular or plural refers to a natural person who views, downloads or interacts with any AccuWeather Sites.

WHAT INFORMATION DO WE COLLECT?

We may collect Your PII or device information, including Your device's location, when You use the AccuWeather Sites. Users are informed during the registration or onboarding process for certain AccuWeather Sites of the information We may collect about You or Your device and prompted to provide that information or grant Us access to it for specified purposes such as product improvements and push notifications.

Information We ask You to provide. We may ask You to provide PII or allow AccuWeather and/or its Providers to identify or contact You. We may request this information when we ask You to register for fee-based services, although some free products and services may also request or require registration. For example, We may request PII from You when You create an account, download an application or content through AccuWeather Sites, upload content (e.g., photos, videos) to AccuWeather Sites, subscribe to e-mail newsletters or other content made available by AccuWeather Sites, or report a problem with Your account or AccuWeather Sites. As a registered subscriber or user, You may be able to download software, enter contests or sweepstakes, order e-mail newsletters or participate in additional services or other promotions offered on AccuWeather Sites.

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device and some of these are provided to Your device by Us or our Providers. These may be in the form or numbers or combinations of letters, numbers and other characters or other codes. These may be used to allow AccuWeather and its Providers and others who assist AccuWeather in the support of AccuWeather Sites to know Your device's location, web browsing movements or information about the environment near the device. When You use certain AccuWeather Sites, We allow You to choose when and how often to share Your device location data with Us and the purposes for which We or our Providers may use Your device location data. Basic AccuWeather app features will still function if You choose not to share Your device location data to receive personalized content and advertising.

When you use AccuWeather Sites, your device may send us some or all of the following:

- **GPS Coordinates.** The GPS coordinates of a device. On many devices, enabling or disabling "Location Services" or a similar setting controls whether the device sends GPS coordinates.
- **Internet Protocol (IP) Address.** An IP Address is a number automatically assigned by Your Internet Service Provider (ISP). The IP address is the host computer a device uses to connect to the ISP's network to send information to Us or to our Providers and for a device to receive information back from Us or from our Providers.
- **Device ID.** A Device ID is a combination of letters and numbers that is unique to the device You are using. The Device ID identifies the device, regardless of who is using the device. On many devices, the Device ID is provided by the device manufacturer and stored permanently in the memory of the device. Depending on how the manufacturer configured the device, You may not be able to change it.
- **Advertising ID (AAID) or ID for Advertising (IDFA).** These are combinations of letters and numbers that are unique to the device You are using. However, these identifiers may not be permanent. Depending on Your device, You may be able to reset them through the settings of Your device or Your browser.
- **Information about other devices that are near Your device.** Your device commonly has several types of wireless communications methods, and each is enabled or disabled separately by You. If You are using a wireless or cellular connection, the device may log and transmit when it has come in contact or connected to other devices or components of the network the device is using. These include things such as:
 - When You enable WiFi, a basic service set identifier (BSSID) of a WiFi access point near the device
 - When You enable a cellular connection, a cell tower near the device
 - When You enable Bluetooth, a Bluetooth beacon near the device
- **Information from sensors on Your device.** Many mobile devices include sensors that measure information about the surroundings of the device. These include things like gyroscopes, accelerometers and altimeters that measure things like rotation, speed direction and altitude. Some wearable devices also include sensors for body conditions like pulse and body temperature.



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is using.

- **Cookies.** Cookies are files with small amounts of data, which may include an anonymous unique identifier. If You are accessing an AccuWeather Site through a browser, including a browser on a mobile device, cookies may be sent to the browser and stored in the device's memory. This identifies the device the next time it accesses an AccuWeather Site through a browser. You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if You do not permit the device to accept cookies, Your experience may not be optimal when You return to an AccuWeather Site because We may not recognize the device. You can learn more about how we use cookies [here](#).
- **Pixel Tags, Web Beacons, Flash Shared Objects/HTML5 Local Storage/HTML5 Mini Databases.** Many mobile devices use these technologies which allow for the storage of information on the mobile devices and, in effect, allow the enhancement of internet browsing. The Flash Shared Objects, HTML5 Local Storage and HTML5 Mini Databases also allow the device to track a user's web browsing movements across the internet and not just on one particular website. You can learn more about how we use these technologies [here](#).

If you turn off "Location Services" or a similar setting that controls GPS functionality, the device still may automatically send or receive this other information as long as you have these other communications types enabled. You should read the instructions related to Your device, operating system or browser to learn about how to control the information Your device may transmit.

We do not respond to web browser Do Not Track signals at this time.

Weather observations, videos and other information You choose to upload or submit to Us. You may have the opportunity to submit information about Yourself and your surroundings, such as weather-related data You observe, as well as your present location or another location of interest. You also may be able to post or submit photos, videos, graphics, information, comments, and other content to an AccuWeather Site. When you submit this information, it becomes the property of AccuWeather, and you accept responsibility for its accuracy, appropriateness and legality. It may be distributed and become publicly available. It may be viewed, read, collected, or used by others, outside of Our control, including any geo-location, tags, or other metadata in the submission.

Information about You that You choose to share through Social Media. You may engage with Our content on or through social media services or other third-party platforms such as Facebook, Twitter and others that are integrated to an AccuWeather Site. We refer to those here generally as "Social Media." When you engage with Our content on or through Social Media, We may have access to certain information in Your profile with that Social Media platform if You have enabled Your profile details to be shared. This may include your name, e-mail address, photo, gender, birthday, location, an ID associated with the Social Media profile, user files, photos and videos, list of friends or connections, people You follow and who follow You, posts, "likes" and more. You should read the privacy policies and terms of use of the Social Media platforms You use and check Your privacy settings on those Social Media platforms to make sure You are permitting those platforms to share only the information that You want to share.



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Your Mobile Device SMS / Text Messages. You may decide to opt-in and consent to receiving SMS / text messages from AccuWeather. If you do, we do not sell or disclose Your SMS / text messaging opt-in data and consent to any unaffiliated third parties.

HOW DO WE USE THIS INFORMATION?

It is important for Us to know Our users. AccuWeather uses the information it collects to:

- Provide You weather alerts at the location(s) You provide us
- Provide You a more accurate service
- Provide You a user-friendly and engaging service with content We believe will be most relevant to You
- Deliver to You targeted or contextual advertising We and our advertising Providers believe will be most relevant to You
- Analyze the traffic and use patterns on AccuWeather Sites
- Provide You up-to-date information on Our products, Our services and the AccuWeather Sites
- Provide access to subscription-based AccuWeather Sites
- Process and verify subscriptions
- Bill for subscription-based AccuWeather Sites and other services
- Process Your data access and deletion requests

HOW DO WE SHARE THIS INFORMATION?

We may disclose information to Our affiliated companies.

We also may disclose information to unaffiliated third-party Providers. We deliver valuable information to You on AccuWeather Sites free of charge or at low rates. We can accomplish this by working with Providers. You can find a list of these Providers [here](#). We update this list from time to time, so You should review it from time to time. You also should visit the sites of these Providers and review their privacy terms and disclosures.

These unaffiliated third-party Providers may:

- **Provide services to Us needed to operate the AccuWeather Sites**, such as website hosting and moderating, mobile application hosting, data analysis, payment processing, order fulfillment, infrastructure provision, IT services, customer service, e-mail and direct mail delivery services, credit card processing, auditing services and other services. We need to provide certain information in order to enable them to provide those services to Us. For example, We may

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- **Serve advertisements when You visit AccuWeather Sites.** Providers may use information about Your visits to AccuWeather Sites and other web sites in order to provide advertisements about goods and services they believe may be of interest to You. AccuWeather Sites may be designed to utilize Online Behavioral Advertising (OBA). This means that certain information regarding Your internet viewing behaviors or practices, over periods of time and perhaps involving websites or applications which are not AccuWeather Sites, may be used for the purpose of choosing advertising to display to You. If You would like more information about this practice and to know Your choices about not having this information used by these companies, see <https://www.aboutads.info/choices> or https://networkadvertising.org/managing/opt_out.asp or <https://choice.live.com/AdvertisementChoice> or <https://youronlinechoices.eu/>.
- **Use the information to offer promotions to you for other products and services.** For example, many wireless products may be made available through cooperative arrangements with Providers who offer specialized products, information or services that We believe work well with the AccuWeather Sites.
- **Use the information in combination with other information.** Providers may have obtained other information directly from You or from other sources that are not related to Us and not related to Your use of AccuWeather Sites. We enter into agreements with these Providers that provide, among other things, that they keep PII they receive from Us confidential, that they only use it for specific purposes, that they provide access to it and that when they receive a valid request to delete it, they delete it within a reasonable period of time.

We also may disclose PII we collect if We think it is necessary under applicable law. This may include laws outside your country of residence. We may need to do this:

- to comply with legal process
- to respond to requests from public and government authorities, including public and government authorities outside your country of residence
- to protect Our rights, privacy, safety, or property or Yours
- to complete a reorganization, merger, sale, joint venture, assignment, transfer, or other disposition of all or any portion of Our business, assets, or stock

Disclosures relating to our Provider Google. Some or all AccuWeather Sites make use of Google Analytics Demographics and Interest Reporting. AccuWeather Sites also may make use of other Google Analytics for Display Advertising features, including Remarketing, Google Display Network Impression Reporting or DoubleClick Campaign Manager integration. We are required by Google to disclose the following information to You in Our Privacy Policy in connection with Our use of any Google Analytics for Display Advertising features on AccuWeather Sites:

- You may opt out of Google Analytics for Display Advertising or customize Google Display Network advertising by using the [Google Ads Settings page](#). You may also prevent Your data from being collected and used by Google Analytics by opting out through the use of the [Google Analytics Opt-out Browser Add-on](#).

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ads on sites across the Internet.

- AccuWeather and third-party vendors, including Google, may use first-party cookies (such as the Google Analytics cookies) and third-party cookies (such as the DoubleClick cookie) together to: (a) inform, optimize and serve ads based on a user's past visits to AccuWeather Sites or (b) report how Your ad impressions, other uses of ad services, and interactions with these ad impressions and ad services are related to visits to AccuWeather Sites.
- Data from Google Analytics Demographics and Interest Reporting may be utilized by AccuWeather to help recognize and understand user preferences, to make improvements to AccuWeather Sites, to choose content and advertising to display to You, and for other business purposes that will allow AccuWeather to better serve You.

WHERE IS THE INFORMATION STORED?

AccuWeather Sites are controlled and operated from within the United States. PII may be stored and processed in any country where we have facilities or Providers. When You consent to use AccuWeather Sites, You are consenting to the transfer of information to countries outside of your country of residence, including to the United States, which may provide for different data protection rules than in Your country.

HOW LONG IS THE INFORMATION STORED?

We retain PII for as long as You have a registered account with Us or as long as needed to provide You services on the AccuWeather Sites. If You request that We delete or restrict certain PII about You controlled by Us, We will comply with your request, but We may retain and use the PII for a period of time. For example, We may use the records to follow-up on a request, resolve a dispute or as needed to comply with applicable law. In addition, some PII may be stored on back-up files for financial, legal, or technical reasons.

HOW CAN YOU ACCESS AND CONTROL YOUR INFORMATION?

Controlling Information Your Device Sends to Us. Most devices and web browsers offer privacy settings and options where you can control the information that Your device sends. Changing these settings will not prevent you from seeing advertisements and offers, but those advertisements and offers may not be tailored to your interests and needs. You may disable cookies, reset your IDFA or AAID, or turn off location-based (GPS) services. We do not override these settings or options, and You can change them at any time. We encourage you to use them to enhance your choices and personalize your experiences. However, in order to access certain content, features, services, products, or benefits of AccuWeather Sites, you may be required to provide Us certain information. Basic AccuWeather app features will still function if You choose not to share Your device location with Us to receive local content and customized advertising.

Online Behavioral Advertising (OBA). If You desire to opt-out of OBA described above in the section "How Do We Share Your Information?", You should visit <https://www.aboutads.info/choices> for web-based advertising), and <https://www.aboutads.info/appchoices> for mobile advertising. This hyperlink and process is the recommended tool for



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Accessing and updating Your online account information. If You have a subscription or account with Us where You voluntarily provided PII through email, registration forms, the best way to access or control this information is to visit the applicable AccuWeather Site to update Your online profile, change Your password. If You have a user name or password associated with an account, You are responsible for maintaining the confidentiality of Your user name and password.

US Residents. If You have a subscription or account with Us where You voluntarily provided PII through email, registration forms, or other contact forms request, the best way to update Your subscription or account information is to visit the applicable AccuWeather Site to update Your online profile or change Your password. You also can request that We provide You a summary of PII we maintain in connection with Your account. Upon your request, if we have any of this PII, we will update or correct that information. Users of the AccuWeather Sites may also request that We provide you with a summary of data We collect about Your device or delete Your device data, inclusive of any PII.

California Residents. California Civil Code Section 1798.83, known as the "Shine the Light" law, permits users who are California residents to request and obtain from us once annually, free of charge, information about PII (if any) we disclosed to third parties for direct marketing purposes in the preceding calendar year. If applicable, this information would include a list of the categories of PII that was shared and the names and addresses of third parties with which we shared information in the immediately preceding calendar year. We do not respond to web browser Do Not Track signals at this time.

Users accessing from the European Union. You have the right to request that We confirm what PII we collect or hold about You, provide a copy of Your PII to You in a machine-readable format and to ask us to correct or update the PII. You also have the right to ask us to delete Your PII that we hold, in accordance with applicable law. However, the deletion of the PII may impact Your access, use and ability to use features on the AccuWeather Sites.

A note about links to Provider sites from AccuWeather Sites. You may seek access to certain products or services on AccuWeather Sites that are available through third parties, either through their own web sites or on web sites hosted by or linked to AccuWeather Sites. When ordering, registering for, or purchasing products or services from these Providers, You may be entering into an agreement with a Provider, and not with AccuWeather, and the Provider's terms may apply. Those terms may differ substantially from this Privacy Policy and other AccuWeather terms and conditions. You should read and understand Providers' terms of use and policies before using their sites or entering into agreements with them. If You have questions or concerns about their sites, terms or conditions, or privacy policies, You should contact the Providers directly. AccuWeather neither endorses nor accepts responsibility for the contents of the Provider sites, products or services. For convenience, We may provide information and contact information about Providers, but We cannot ensure that the contact information is correct or accurate.

Use by Children under age 18. AccuWeather Sites are not directed to children and AccuWeather does not intend to collect any PII from children. Please do not allow children under age 18 to use AccuWeather Sites, provide any PII to AccuWeather, or ask questions or participate in chat rooms on AccuWeather Sites. If We are notified with verifiable information that a child under age 18 has provided PII to Us, We will delete that information as soon as reasonably

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way to control the use of an access device that You allow a child under age 18 to use, and therefore the device may be sending Us information about the device's location and other factors. PLEASE EXERCISE CONTROL OF YOUR DEVICES TO PREVENT MINORS FROM GETTING INTO A SITUATION WHERE THEIR LOCATION MAY BE DISCLOSED TO US, OUR PROVIDERS, OR OTHER THIRD PARTIES.

CHANGES TO THIS PRIVACY POLICY

We recently included a disclosure about our practices regarding your SMS / text messaging opt-in data and consent. We made this disclosure as a requirement by phone carriers with whom You may have services with, and to inform You of our existing practices. We do not share such information with unaffiliated third parties.

HOW DO YOU CONTACT US?

You may request a copy of the data we hold about you or amend or delete that data by contacting the Privacy Officer at privacyofficer@accuweather.com or through a "Contact Us" or similar link on an AccuWeather Site.

For all other inquiries or issues relating to AccuWeather's products or services, please contact AccuWeather's support group at the following email: support@accuweather.com.

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revisions

December 12, 2017 December 5, 2017 August 31, 2017 November 22, 2016 Oct 26, 2016 Aug 3, 2016
Nov 20, 2015 apr 14, 2015 apr 10, 2015 feb 24, 2015 jan 15, 2015 jul 18, 2014 may 15, 2014 dec 18, 2013
may 15, 2013 apr 10, 2012

Reddit, Inc. Privacy Policy Effective December 12, 2017.

We want you to understand how and why Reddit, Inc. ("Reddit," "we" or "us") collects, uses, and shares information about you when you access and use Reddit's websites, mobile apps, widgets, and other online products and services (collectively, the "Services") or when you otherwise interact with us. This Privacy Policy applies to all of our Services, including those that maintain a separate Privacy Notice that incorporates this Privacy Policy by reference.

Information You Provide to Us

We collect information you provide directly to us when you use our Services. Depending on which Service you use, we may collect different information about you. This includes:

Information Regarding Your Use of the Services

We collect the content and other information you provide when you use our Services. This includes information used to create your account (e.g., a username, password and at your option, an email address), account preferences, the content of private messages between you and other users or communities (e.g., modmail), and the content of information you post to the Services (e.g., text, photos, videos, links).

Transactional Information

If you purchase products or services from us (e.g., Reddit Gold), we will collect certain information from you, including your name, address, email address, and information about the product or service you are purchasing. Payments are processed by third-party payment processors (e.g., Stripe and PayPal), so please refer to the applicable processor's terms and privacy policy for more information about how payment information is processed and stored.

Other Information

You may choose to provide other information directly to us. For example, we may collect information when you fill out a form, participate in contests, sweepstakes or promotions, apply for a job, communicate with us via third-party sites and services, request customer support or otherwise communicate with us.

Information We Collect Automatically

When you access or use our Services, we may also automatically collect information about you. This includes:

Log and Usage Data

We may log information when you access and use the Services. This may include your IP address, user-agent string, browser type, operating system, referral URLs, device information (e.g., device IDs), pages visited, links clicked, user interactions (e.g., voting data), the requested URL, hardware settings, and search terms. Except for the IP address used to create your account, Reddit will delete any IP addresses collected after 100 days.

Information Collected from Cookies

We may receive information from cookies, which are pieces of data your browser stores and sends back to us when making requests. We use this information to improve your experience, understand user activity, personalize content and advertisements, and improve the quality of our Services. For example, we store and retrieve information about your preferred language and other settings. For more information on how you can disable cookies, please see "Your Choices" below.

Information Collected from Integrations

We may receive information about you from third-party websites that integrate our Services, including our widgets, buttons, and advertising technology. For example, when you visit a website that uses our comment-embed widget, we may receive information about the web page you visited. You can control how we use this information to personalize the Services for you by adjusting your preferences [here](#).

Location Information

We may receive and process information about your location. For example, with your consent, we may collect information about the specific location of your mobile device (for example, by using GPS or Bluetooth). You can revoke this consent at any time by changing the preferences on your device, but doing so may affect your ability to use all of the features and functionality of our Services. We may also receive location information from you when you choose to share such information on our Services, including by associating your content with a location, or we may derive your approximate location from other information about you, including your IP address.

Information We Collect from Other Sources

We may receive information about you from other sources, including from other users and third parties, and combine that information with the other information we have about you. For example, we may receive demographic or interest information about you from third parties, including advertisers, and combine it with our own data using a common account identifier such as a hash of an email address or a mobile-device ID. You can control how we use this information to personalize the Services for you by adjusting your preferences [here](#).

Social Sharing

We may offer social sharing features or other integrated tools that let you share content or actions you take on our Services with other media. Your use of these features enables the sharing of certain information with your friends or the public, depending on the settings you establish with the third party that provides the social sharing feature. For more information about the purpose and scope of data collection and processing in connection with social sharing features, please visit the privacy policies of the third parties that provide these social sharing features (e.g., [Tumblr](#), [Facebook](#), [Pinterest](#), and [Twitter](#)).

How We Use Information About You

We use information about you to:

- Provide, maintain, and improve the Services;
- Help protect the safety of Reddit and our users, which includes blocking suspected spammers, addressing abuse, and enforcing the [Reddit user agreement](#);
- Send you technical notices, updates, security alerts, invoices and other support and administrative messages;
- Provide customer service;
- Communicate with you about products, services, offers, promotions, and events, and provide other news and information we think will be of interest to you (for information about how to opt out of these communications, see "Your Choices" below);
- Monitor and analyze trends, usage, and activities in connection with our Services; and
- Personalize the Services and provide advertisements, content and features that match user profiles or interests. (for information about how to manage the types of advertisements you experience on our Services, see "Your Choices" below).

How We Share Information

When you use the Services, certain information may be shared with other users and the public. For example:

- When you submit a post or comment to the Services, visitors to and users of our Services will be able to see the content of your posts and comments, the username associated with your posts or comments, and the date and time you originally submitted the post or comment. Although some parts of the Services may be private or quarantined, they may become public (e.g., at the moderator's option in the case of private communities) and you should take that into consideration before posting to the Services.
- When you send private messages or messages via modmail, the recipients of those messages will be able to see the content of your message, your username, and the date and time the message was sent. Moderators may elect to have modmail forwarded to their email accounts

and, as a result, any modmail received by these moderators will be subject to the terms and policies of the moderator's email provider.

- When other users view your profile, they will be able to see information about your activities on the Services, such as your username, prior posts and comments, karma, trophies, moderator status, Reddit Gold status, and how long you have been a member of the Services.

Please note that, even when you delete your account, the posts, comments and messages you submit through the Services may still be viewable or available on our servers. For more information, see "Your Choices" below.

We will not share, sell, or give away any of our users' personal information to third parties, unless one of the following circumstances applies:

- Except as it relates to advertisers and our ad partners, we may share information with vendors, consultants, and other service providers who need access to such information to carry out work for us;
- If you participate in contests, sweepstakes, promotions, special offers, or other events or activities in connection with our Services, we may share information with entities that partner with us to provide these offerings;
- We may share information (and will attempt to provide you with prior notice, to the extent legally permissible) in response to a request for information if we believe disclosure is in accordance with, or required by, any applicable law, regulation, legal process or governmental request, including, but not limited to, meeting national security or law enforcement requirements;
- We may share information in response to an emergency if we believe it's necessary to prevent imminent and serious bodily harm to a person;
- We may share information if we believe your actions are inconsistent with our user agreements, [rules](#), or other Reddit policies, or to protect the rights, property, and safety of ourselves and others;
- We may share information between and among Reddit, and its current and future parents, affiliates, subsidiaries, and other companies under common control and ownership; and
- We may share information with your consent or at your direction.

We may share aggregated or de-identified information, which cannot reasonably be used to identify you.

Ads and Analytics Partners

We may partner with third-party advertisers, ad networks, and analytics providers to deliver advertising and content targeted to your interests and to better understand your use of the Services. These third parties may collect information sent by your computer, browser, or mobile device in response to a request for content, such as unique identifiers, your IP address, or other information about your computer or device. For example:

Advertisers and Ad Networks

Our ad partners and ad networks may use cookies and use related technologies to collect information when ads are delivered to you on our Services, but Reddit does not link to or provide them with your actual Reddit account details. This means that Reddit does not share your individual account browsing habits with advertisers. Reddit cannot see advertisers' cookies and advertisers will not see Reddit cookies.

Analytics Partners

We use analytics partners (such as [Google Analytics](#)) to help analyze usage and traffic for our Services. As an example, we may use analytics partners to analyze and measure, in the aggregate, the number of unique visitors to our Services.

For more information about how you may control the collection and/or use of information for advertising and analytics purposes, please see "Your Choices."

Security

We take reasonable measures to help protect information about you from loss, theft, misuse and unauthorized access, disclosure, alteration, and destruction.

Children under 13

Although we welcome users from all walks of life, Reddit is not intended or directed at individuals under the age of 13. Therefore, individuals under the age of 13 may not create an account or otherwise access or use the Services.

Your Choices

As a Reddit user, you have choices about how to protect and limit the collection, use, and disclosure of, information about you. This includes:

Preferences

We may provide you with tools and preference settings that allow you to access, correct, delete, and modify information associated with your account.

Account Information

You may delete your account information at any time by logging into your account and following the steps under "Preferences." When you delete your account, your profile is no longer visible to other users and disassociated from content you posted under that account. Please note, however, that the posts, comments, and messages you submitted prior to deleting your account will still be visible to others, unless you delete such content. We may also retain certain information about you as required by law or for legitimate business purposes after you delete your account.

Cookies

Most web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove or reject first- and third-party cookies. Please note that if you choose to remove or reject cookies, this could affect the availability and functionality of our Services.

Advertising and Analytics

Some analytics providers we partner with may provide specific opt-out mechanisms and we may provide, as needed and as available, additional tools and third-party services that allow you to better understand cookies and how you can opt-out. For example, you may manage the use and collection of certain information by Google Analytics [here](#).

We also offer you choices about receiving personalized advertisements. You can adjust how we personalize advertisements for you by visiting your ads preferences [here](#). You may also generally opt out of receiving personalized advertisements from certain third-party advertisers and ad networks. To learn more about these advertisements or to opt out, please visit the websites of the [Digital Advertising Alliance](#) and the [Network Advertising Initiative](#).

Do Not Track

Most modern web browsers give you the option to send a Do Not Track signal to the websites you visit, indicating that you do not wish to be tracked. However, there is no accepted standard for how a website should respond to this signal, and we do not take any action in response to this signal. Instead, in addition to publicly available third-party tools, we offer you the choices described in this policy to manage the collection and use of information about you.

Promotional Communications

You may opt out of receiving promotional communications from us by following the instructions in those communications. If you opt out, we may still send you non-promotional communications, such as information about your account or your use of our Services.

Mobile Notifications

With your consent, we may send promotional and non-promotional push notifications or alerts to your mobile device. You can deactivate these messages at any time by changing the notification settings on your mobile device.

International Data Transfers

We are based in the United States and the information we collect is governed by U.S. law. By accessing or using the Services or otherwise providing information to us, you consent to the processing, transfer and storage of information in and to the U.S. and other countries, where you may not have the same rights as you do under local law.

In connection with Reddit's processing of personal data received from the European Union and Switzerland, we adhere to the EU-U.S. and Swiss-U.S. Privacy Shield Program ("Privacy Shield") and comply with its framework and principles.

For more information about the Privacy Shield principles and to view our certification, please visit the U.S. Department of Commerce's [Privacy Shield website](#).

Please direct any inquiries or complaints regarding our compliance with the Privacy Shield principles to the point of contact listed in the "Contact Us" section below. If we do not resolve your complaint, you may submit your complaint free of charge to [JAMS](#). Under certain conditions specified by the Privacy Shield principles, you may also be able to invoke binding arbitration to resolve your complaint. We are subject to the investigatory and enforcement powers of the Federal Trade Commission. If we share EU or Swiss data with a third-party service provider that processes the data solely on our behalf, then we will be liable for that third party's processing of EU or Swiss data in violation of the Privacy Shield principles, unless we can prove that we are not responsible for the event giving rise to the damage.

Changes

We may change this Privacy Policy from time to time. If we do, we will let you know by revising the date at the top of the policy. If we make a change to this policy that, in our sole discretion, is material, we will provide you with additional notice (such as adding a statement to [r/announcements](#), the front page of the Services or sending you a notification). We encourage you to review the Privacy Policy whenever you access or use our Services or otherwise interact with us to stay informed about our information practices and the ways you can help protect your privacy. If you continue to use our Services after Privacy Policy changes go into effect, you consent to the revised policy.

Contact Us

If you have any questions about this Privacy Policy, please email legal@reddit.com.

about blog about advertise careers	help site rules help center wiki reddiquette mod guidelines contact us	apps & tools Reddit for iPhone Reddit for Android mobile website buttons	<3 reddit gold redditgifts
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EXHIBIT 91



Privacy Policy

Effective Date: 1/1/2020

Rite Aid respects your concerns about privacy. This Privacy Policy describes the personal information we may obtain about you, including when you visit our retail stores, use the Rite Aid website, the Rite Aid Online Store, or the Rite Aid Pharmacy mobile app and related services (including the Text Messaging Program) (collectively, the “Sites”); or otherwise communicate with us. We also describe how we may use and disclose that information, and explain the choices available to you regarding our use of the information, the measures we take to protect the security of the information, and how you can [contact us](#) if you have any questions about our privacy practices.

The personal information we may obtain may include your “protected health information” (“PHI”), which is subject to privacy and security protections under the Health Insurance Portability and Accountability Act of 1996 (“HIPAA”). Please see our [Notice of Privacy Practices](#) for additional information regarding our use of PHI.

Information We Obtain

We may obtain personal information in various ways, such as when you visit our stores, interact with our Sites, or create a Rite Aid account. The types of personal information we may obtain include:

- contact information, such as name, phone number, postal address and email address;
- demographic information, such as date of birth and gender;
- payment card information, including card number, expiration date, and security



- information stored in or associated with Rite Aid accounts, including username and password;
- transaction information, including online order history;
- information related to prescription management (such as medical information and prescription numbers);
- comments, product reviews and other content provided through our Sites;
- information provided to receive discounts or coupons, including through wellness+ accounts;
- geolocation data;
- information about use of our Sites (such as content shared with others), which we may associate with Rite Aid account data;
- for individuals who apply for a career opportunity with Rite Aid: contact information, data submitted on a résumé or in a job application, and other information we obtain to administer the careers process; and
- for individuals who provide services to Rite Aid: contact information and other details we may obtain in managing our relationship with such service providers.

We also may obtain other information about you in ways we describe at the time we collect the information or otherwise with your consent.

Information We Collect Automatically

When you interact with our Sites, we obtain certain information by automated means, such as cookies, web server logs, web beacons, and other technologies. A “cookie” is a text file that websites send to a visitor’s computer or other Internet-connected device to uniquely identify the visitor’s browser or to store information or settings in the browser. A “web beacon,” also known as an Internet tag, pixel tag or clear GIF, links web pages to web servers and their cookies and may be used to transmit information collected through cookies back to a web server.

We may use these automated technologies to collect information about your equipment, browsing actions, and usage patterns. The information we obtain in this manner may include your device IP address, identifiers associated with your devices, types of devices connected to our services, web browser characteristics, device characteristics, language preferences, referring/exit pages, clickstream data,



preferences; (4) measure the usability of our Sites and the effectiveness of our communications; (5) provide customer support; and (6) otherwise manage and enhance our Sites.

Your browser may tell you how to be notified when you receive certain types of cookies or how to restrict or disable certain types of cookies. You can find out how to do this for your particular browser by clicking "help" on your browser's menu or visiting www.allaboutcookies.org. For mobile devices, you can manage how your device and browser share certain device data by adjusting the privacy and security settings on your device. Our Sites are not designed to respond to "do not track" signals received from browsers. Please note that without cookies you may not be able to use or benefit from all of the features of our Sites.

Third-Party Web Analytics Services

We use third-party web analytics services on our Sites, such as Google Analytics and Adobe Analytics. The service providers that administer these services use automated technologies to collect data (such as IP addresses, cookies, and other device identifiers) to evaluate use of our Sites. To learn more about Google Analytics and how to opt out, please visit www.google.com/analytics/learn/privacy.html.

Online Tracking And Interest-Based Advertising

Through our Sites, we may collect information about your online activities to provide you with advertising about products and services tailored to your interests. You may see our ads on other websites or mobile apps because we engage in online advertising. This allows us to target our messaging to users considering demographic data, users' inferred interests and browsing context. Ad technology companies track users' online activities over time by collecting information through automated means, including through the use of cookies, web server logs, web beacons and other similar technologies. This information is used to show ads that may be tailored to individuals' interests, to track users' browsers or devices across multiple websites, and to build a profile of users' online browsing activities. The information collected may include data about users' visits to websites that participate in the online ad ecosystem, such as the pages or ads viewed and the actions taken on the websites. This data collection takes place both on our Sites and on third-party websites that participate in the online ad ecosystem. This process also helps us track the effectiveness of our marketing efforts. To learn how to opt out of interest-based advertising, please visit www.aboutads.info/choices and <http://www.networkadvertising.org/choices/>.



USE THE INFORMATION WE OBTAIN

We may use the personal information we obtain to:

- provide products and services to you and enable you to make purchases in our stores or through our Sites;
- process and fulfill orders in connection with our products and services and keep you informed about the status of your orders;
- establish and manage your Rite Aid accounts;
- communicate with you about our products and services (including messaging with Rite Aid pharmacists, who may provide you with health care information);
- send you promotional materials about Rite Aid and third-party products and services;
- administer your participation in surveys, events, contests and programs (including discount or coupon-related offers);
- provide you with location-based information (such as finding a Rite Aid store near you);
- share it with third parties (such as online advertising services) for the purpose of serving you content or advertising that might be of interest to you
- personalize your experience on our Sites;
- provide customer and technical support;
- operate, evaluate, develop, manage and improve our business (including operating, administering, analyzing, and improving our Sites; developing new products and services; managing and evaluating the effectiveness of our communications; conducting market research, aggregating and anonymizing data, and performing data analytics; facilitating the provision of services to Rite Aid; and performing accounting, auditing, and other internal functions);
- protect against, identify, and prevent fraud and other criminal activity, claims, and other liabilities; and
- comply with and enforce applicable legal requirements, relevant industry standards, contractual obligations and our policies, including this Privacy Policy, our HIPAA Notice of Privacy Practices, and our Terms and Conditions.



consent.

Information Sharing

We may share information about you with our service providers who perform services on our behalf. In addition, we may also share your personal information with third-party brand manufacturers, with whom we may partner to develop discount or coupon programs; and with third parties who provide services that we offer through our Sites. If you opt out of receiving email advertisements from us, we may share that information with third parties to instruct them not to send advertisements to you on our behalf.

We also may disclose information about you in other circumstances, including (1) if we are required to do so by law or legal process; (2) in response to requests by government agencies, such as law enforcement authorities; (3) to establish, exercise, or defend our legal rights; (4) when we believe disclosure is necessary or appropriate to prevent physical or other harm or financial loss; or (5) in connection with an investigation of suspected or actual illegal activity. We also reserve the right to transfer personal information we have about you in the event we sell or transfer (or contemplate the sale or transfer of) all or a portion of our business or assets (including in the event of a merger, acquisition, joint venture, reorganization, divestiture, dissolution, or liquidation).

Links to Other Online Services

Our Sites may provide advertisements for or links to other online services for your convenience and information, and may include third-party features such as apps, tools, payment services, widgets and plug-ins (e.g., PayPal, Facebook, Twitter, Instagram, LinkedIn and YouTube). These third-party online services and features may operate independently from us. The privacy practices of the relevant third parties, including details on the information they may collect about you, is subject to the privacy statements of these parties, which we strongly suggest you review. To the extent any linked third-party online service or feature is not owned or controlled by us, Rite Aid is not responsible for these third parties' information practices.

Your Choices



from us, or submit a request, please contact us as specified in the [How To Contact Us](#) section below.

If you are a California consumer, for more information about your privacy rights, please see the section of this Privacy Policy called [California Consumer Privacy Statement](#).

How We Protect Personal Information

We maintain administrative, technical, and physical safeguards designed to protect personal information against accidental, unlawful, or unauthorized destruction, loss, alteration, access, disclosure, or use.

Children's Personal Information

Our Sites are designed for a general audience and are not directed to children under the age of 13. We do not knowingly collect or solicit personal information from children under the age of 13 through our Sites. If you believe that a child under the age of 13 may have provided us with personal information online, please contact us as specified in the [How to Contact Us](#) section of this Privacy Policy.

Updates To This Privacy Policy

We may update this Privacy Policy from time to time and without prior notice to you to reflect changes in our personal information practices with respect to our Sites. We will indicate at the top of the Privacy Policy when it was most recently updated.

How To Contact Us

You can contact us to update your preferences, update or correct your information, submit a request, or ask us questions.



Hearing or Speech Disabled: Dial 711 to reach us through the National Telecommunications Relay.

You also may write to us at:

Privacy Officer
Rite Aid
30 Hunter Lane
Camp Hill, PA 17011

CALIFORNIA CONSUMER PRIVACY STATEMENT

For California Consumers

This California section supplements the [Rite Aid Privacy Policy](#) and applies solely to California consumers (excluding Rite Aid personnel). This California Consumer Privacy Statement uses certain terms that have the meanings given to them in the California Consumer Privacy Act of 2018 and its implementing regulations (the “CCPA”).

1. Notice of Collection and Use of Personal Information

We may collect the following categories of personal information about you:

- **Identifiers:** identifiers such as a real name, alias, postal address, unique personal identifier (such as a device identifier; cookies, beacons, pixel tags, mobile ad identifiers and similar technology; customer number, unique pseudonym, or user alias; telephone number and other forms of persistent or probabilistic identifiers), online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, and other similar identifiers;
- **Additional Data Subject to Cal. Civ. Code § 1798.80:** signature, physical characteristics or description, state identification card number, bank account number, credit card number, debit card number, and other financial information;
- **Protected Classifications:** characteristics of some protected classifications under California or federal law, such as race, age, gender, disability status, and veteran status;
- **Commercial Information:** commercial information, including records of products



- **Biometric Information:** imagery of the face;
- **Online Activity:** Internet and other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding your interaction with websites, applications or advertisements;
- **Geolocation Data;**
- **Sensory Information:** audio and visual information;
- **Employment Information:** professional or employment-related information that is typically found on a résumé;
- **Inferences:** inferences drawn from any of the information identified above reflecting your preferences, characteristics, and purchasing behavior.

We may use the categories of personal information listed above for the purposes described in our Privacy Policy. In addition, we may use these categories of personal information for certain business purposes specified in the CCPA, as described in this table:

Purposes
Performing services, including maintaining or servicing accounts, providing custo
Auditing related to a current interaction with you and concurrent transactions, inc
Short-term, transient use, including, but not limited to, the contextual customizati
Detecting security incidents, protecting against malicious, deceptive, fraudulent, c
Debugging to identify and repair errors that impair existing intended functionality
Undertaking internal research for technological development and demonstration
Undertaking activities to verify or maintain the quality or safety of a service or dev

In addition, we also may use the Identifiers and Employment Information for purposes of managing career opportunities. We also collect information about Protected Classifications that applicants voluntarily share with us to comply with equal employment opportunity obligations.



1 above, during the 12-month period prior to the effective date of this California Consumer Privacy Statement. For the personal information collected during that timeframe, we describe below: (a) the categories of sources from which we may have obtained the personal information, (b) the categories of third parties with whom we may have shared the information, (c) the categories of personal information we may have sold, and (d) the categories of personal information we may have disclosed for a business purpose.

a. Sources of Personal Information

We may have obtained personal information about you from various sources, as described below.

Categories of Sources of Data Collection

- Directly from you, such as when you make a purchase or use a service in a Rite Aid
- From your device(s), such as when you visit our Sites
- Vendors who perform services on our behalf
- Our joint marketing partners
- Online advertising companies
- Consumer data resellers

b. Sharing of Personal Information

We may have shared your personal information with certain categories of third parties, as described below.

Categories of Third Parties	Identifiers	Ad
Our affiliates	X	
Vendors who perform services on our behalf	X	X
Professional services organizations, such as auditors and law firms	X	X
Our joint marketing partners	X	
Online advertising services	X	
Government entities	X	X
Data analytics providers	X	



c. Sale of Personal Information

We may sell, as defined under the CCPA, your personal information with third parties as identified in this Section. We may make your data available to certain third parties (such as online advertising services) for the purpose of providing you with content and advertisements that may be of interest to you. You have the right to opt out of this disclosure of your information, as detailed below.

During the 12-month period prior to the effective date of this California Consumer Privacy Statement, we may have sold the following categories of personal information:

- Identifiers
- Commercial Information
- Online Activity
- Inferences

We do not sell the personal information of minors under 16 years of age without affirmative authorization if we have actual knowledge of the individual's age.

d. Disclosure of Personal Information for a Business Purpose

We may have disclosed to third parties for a business purpose the following categories of personal information:

- Identifiers
- Additional Data Subject to Cal. Civ. Code § 1798.80
- Protect Classifications
- Commercial Information
- Biometric Information
- Online Activity
- Geolocation Data
- Sensory Information



- Inferences

3. California Consumer Privacy Rights

Your Choices

You may have certain choices regarding your personal information, as described below.

Access: You may have the right to request, twice in a 12-month period, that we disclose to you the personal information we have collected, used, disclosed, and sold about you during the past 12 months.

Deletion: You may have the right to request that we delete certain personal information we have collected from.

Opt-Out of Sale: You may have the right to opt-out of the sale of your personal information.

How to Submit a Request

Access and Deletion Requests: Click [here](#) or call us at 1-855-648-6980.

Opt-Out Requests: Click [here](#) or call us at 1-855-648-6980.

Verifying Requests. To help protect your privacy and maintain security, we will take steps to verify your identity before granting you access to your personal information or complying with your request. You will be required to provide some information, based on the nature of your request, including, but not limited to: name, email, home address, date of birth, phone number, loyalty card look-up phone number, wellness+ card number, or plenti card number. In addition, if you ask us to provide you with specific pieces of personal information, we will require you to sign a declaration under penalty of perjury that you are the consumer whose personal information is the subject of the request. If you designate an authorized agent to make an access, deletion, or opt-out of sale request on your behalf (a) we may require you to provide the authorized agent written permission to do so, and (b) for access and deletion requests, we may require you to verify your own identity directly with us (as described above).

Additional Information. If you choose to exercise any of your rights under the CCPA, you have the right to not receive discriminatory treatment by us. To the extent permitted by applicable law, we may charge a reasonable fee to comply with your request. This Statement is available in alternative formats upon request. Please contact Tracy L. Adams, Telephone # 717-214-8884, Email:



contact us by calling 711 (the free nationwide telecommunications relay service). After calling 711, you may communicate to the Communications Assistant answering the 711 call that you wish to reach Rite Aid at 1-855-648-6980. The Communications Assistant will then facilitate the communications between you and the Rite Aid representative.



**Refill
Prescriptions**



**Shop by
Department**



**Mobile
App**



Call Us: 1-800-RITE-AID
(1-800-748-3243)



National Telecommunications Relay



About Us



Rite Aid Rewards



Help



[Terms And Conditions](#) | [Privacy](#) | [Accessibility](#) | [CA Privacy](#) | [Do Not Sell My Personal Information](#)

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EXHIBIT 92



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Last updated on March 15, 2021.

This Privacy Statement describes how Shutterstock manages personal data and personal information, and respects your privacy. This policy may be amended from time to time. We encourage visitors to and users of our sites to regularly review our Privacy Policy.

All "**Personal Information**" (which is defined as any information that identifies or can be used to identify, contact, or locate the person to whom such information pertains) that we collect and maintain will be subject to this Privacy Policy, as amended from time to time. To update your information and preferences, see the section entitled "[Updating Your Personal Information and Privacy Preferences](#)".

Shutterstock is made up of different legal entities. This privacy notice is issued on behalf of the Shutterstock group of companies. When we refer to "Shutterstock" "we" "us" or "our" in this privacy

As a visitor to the Site, you can engage in many activities without providing any Personal Information.

However, when you register to use a Shutterstock site and order products or services as a Shutterstock subscriber in order to provide the services to you, we may collect the following Personal Information from you:

- Contact information such as your name, phone and fax numbers, address and email address; and
- Billing information such as the number, expiration date, card type and billing address of your credit card;
- Demographic information such as your job title, job description and company name and company type; and
- Profile data, including your username and password, details about your purchases and the Content that you license from us.

If you submit content to Shutterstock for licensing, you may be asked to provide the following information:

- Contact information such as your name, phone number, primary address, and email address.
- Payment and contributor information including, but not limited to, payout method, payout email, desired display name, content focus, camera equipment, and information about your skill level and creative process.

Depending upon the activity, some of the information that we ask you to provide is identified as mandatory and some as voluntary. If you do not provide the mandatory data with respect to a particular activity, you will not be able to engage in that activity.

As is true of most websites, when you use the Site, Shutterstock or third party subprocessors contracted by Shutterstock may also collect certain technical and routing information about your computer to facilitate your use of the Site and its services. For example, we may log environmental variables, such as browser type, operating system, CPU speed, and the Internet Protocol (IP) address of your computer. We use these environmental variables to facilitate and track your use of the Site and its services. Shutterstock also uses such environmental variables to measure traffic patterns on the Site. To better understand the needs of our visitors to the Site we may occasionally match such information with your Personal Information.

type of device you use, and operating system version. We do not ask for, access or track any location-based information from your mobile device at any time while downloading or using our Mobile Apps or Services.

2. Updating Your Personal Information and Privacy Preferences

Upon request Shutterstock will provide you with information about and access to your Personal Information that we process. To request this information please contact us at privacy@shutterstock.com.

You have the right to access and correct, or delete your Personal Information and privacy preferences at any time. This may be accomplished by clicking on the link, "[My Account](#)", where you can view and make changes to most of your Personal Information immediately. If you wish to delete your account or request that we no longer use your information to provide you services by visiting the "[My Account Preferences](#)" link on the site and following the instructions under the section "Delete My Account". If you are a contributor, you can change your profile [here](#). For security purposes, certain Personal Information can only be changed by [contacting support](#). We will respond to your request promptly within a reasonable timeframe.

3. How Your Personal Information Is Used

Shutterstock collects your information in order to provide services to you, comply with our legal obligations, and to improve our products and services. We do not sell, rent or share your personally identifiable information to or with third parties in any way other than as disclosed in this Privacy Policy. Shutterstock may use this information to:

- Authenticate and provide access to the Shutterstock websites, mobiles applications, and services.
- Process your financial transactions.
- Send you order / renewal confirmations.

- Customize your experience, including targeting our services, search results, and offerings to you.

We store information that we collect through cookies, log files, transparent images, and/or third party sources to create a summary of your preferences. We tie your personally identifiable information, and/or your membership usage history, to information in the summary, in order to provide tailored promotions and marketing offers, to improve the content of the site for you and/or to determine your preferences.

In certain situations, Shutterstock may be required to comply with legal obligations to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

Where required by law (e.g., to comply with a subpoena, warrant, court order, or legal process served on Shutterstock), and when we believe that disclosure is necessary to protect our rights, avoid litigation, protect your safety or the safety of others, investigate fraud, and/or respond to a government request. We may also disclose information about you in order to comply with our legal obligations if we determine that such disclosure should be made for reasons of national security, law enforcement, or other issues of public importance.

4. Legal Bases for Processing

For individuals located in European Economic Area (EEA) and UK, we rely on the following legal bases for the processing of your personal data:

- Where processing is necessary to perform our contract with you:
 - Providing access to the Shutterstock websites, mobile applications, and services to fulfill the terms of your contract;

- Administering our operations and meeting our contractual obligations to our customers and contributors;
- Analyzing and understanding how our online platforms are being used;
- Maintaining the security and integrity of our websites, mobile applications and other services;
- Sending you requested product or service information and keeping you informed about special offers and services of Shutterstock and selected third parties;
- Administering promotions and sweepstakes;
- Research and product/service development for the improvement of our Site, services and offerings.

- Processing is necessary for compliance with Shutterstock's legal obligations, including:
 - Investigating and protecting against intellectual property infringement, fraud, spam, harassment, crime and security risks;
 - Compliance with money laundering, bribery, corruption, and applicable sanctions laws and regulations; and
 - Meeting financial reporting and other obligations under applicable securities laws.

5. Information Sharing with Service Providers / Agents

If you have licensed Content from Shutterstock, you may access your license history by visiting [License History](#).

7. Your Choices (Opt Out)

Shutterstock does not sell your personal data or personal information to any third party. We do use third party advertising services to manage the advertisements that we place on other sites. Our third-party partner may use technologies such as cookies and trackers to gather information about your activities on this site and other sites in order to provide you advertising based upon your browsing activities and interests. If you wish to not have this information used for the purpose of serving you interest-based ads, you may opt-out by clicking [here](#) (or if located in the European Union click [here](#)) Please note this does not opt you out of being served ads. You will continue to receive generic ads.

Shutterstock will only use your personal information for the purposes described in this Privacy Statement and will not use your personal information for a purpose that is materially different without your express authorization.

- Your Personal Information is encrypted whenever it is transmitted to Shutterstock.
- When you enter sensitive information (such as credit card number) on our registration or order forms, we encrypt that information using transport layer security technology

We strive to protect the Personal Information submitted to us, both during transmission and once we receive it. However, no method of transmission over the Internet, or method of electronic storage, is 100% secure. While we take into account the sensitivity of the Personal Information we collect, process and store, and the current state of technology to use these measures protect your Personal Information, we cannot guarantee its absolute security.

If you have any questions about security on our Web Sites, you can send email to us at

Statement

We enable you to create a profile for accessing blogs or online communities for sharing information such as messages, photos and videos. Please note that we cannot control the actions of others with whom you may choose to share your pages and information. Any information you post to a public bulletin board or chat room, such as the Forum For Contributors (the "Forums"), is available to all

rights under a privacy law and we do not charge different prices to users who choose to exercise rights

EXHIBIT 93

Simmons Hanly Conroy Website Privacy Policy

Effective Date: December 7, 2017

Introduction

This website is developed and maintained by Simmons Hanly Conroy LLC (hereinafter “the Simmons Firm,” “we,” or “us”). When you visit our website, mobile app, official social media sites, or other online properties, collectively “Sites” or “Services,” we may collect and use certain information about you. We recognize that you care about how your information is used, and your privacy is important to us. This Privacy Policy explains how we may collect and use your information, particularly your personal information, and the choices you can make about what information you share.

This Privacy Policy applies to information collected by the Simmons Firm, or any affiliated or subsidiary companies, through the Sites or Services that post a link to this Privacy Policy. Please read this Privacy Policy carefully. By continuing to interact with our Sites and Services, you are agreeing to the practices described in this Privacy Policy.

Changes to this Privacy Policy

We ask that you read this Privacy Policy from time to time. We may modify this Privacy Policy at any time in our sole discretion. If we make material changes to this Privacy Policy that increase our rights to use personal information we have previously collected about you, we will obtain your consent through an email to your registered email address.

Information We Collect

The Simmons Firm collects information about you when you interact with our Sites and Services. When you use our Sites and Services, we collect information about the devices you use such as a computer, mobile phone, or tablet. We may collect, store, and use information you provide to us when you use our Sites and Services, including when you, complete a web form, communicate with our live chat agents, or otherwise correspond with us regarding the Sites and Services. The information we collect may include, but is not limited to, your name, phone number, email address, and your reason for communicating with us.

In addition, we may automatically collect information about the devices you use to interact with our Sites and Services. The information we automatically collect may include your device identifier, device information, web browser, and browsing information collected through Cookies and Other Technologies, such as your IP address and location. We may also automatically collect information about how you use the Sites and Services, such as what you have searched for and viewed on the Sites and Services.

Our Sites and Services do not collect personal information about your online activities over time and across third party websites or online services. Therefore, “do not track” signals transmitted from web browsers do not apply to our Sites and Services, and we do not alter any of our data collection and use practices upon receipt of such a signal.

How We Use Your Information

The personal information we collect may be used or processed where the Simmons Firm has a legitimate interest in or other legal basis for processing such data. In some situations the collection of personal information may be required for the operation of the Sites and Services or to provide certain services. The information we collect may be used for the following purposes:

- To serve the functions of the Sites and Services;
- To manage everyday business needs, such as administration and improvement of the Sites;
- To analyze the Sites’ performance and functioning;
- To prevent fraud; to enforce the Sites’ Terms of Use; to comply with all applicable laws and corporate reporting obligations; and to enforce our agreements;
- To analyze how you use the Sites and Services and to perform other market research;
- To communicate with you about our Services;
- To send you further notices, promotions, solicitations, brochures, or other marketing materials regarding our Sites and Services and the services of our businesses, affiliates, and business partners.

We may use your personal information to develop a personal profile about you.

If you notify us that you do not wish to be contacted for marketing purposes, we will not send you marketing information.

How We Share Your Information

We may share your information with third party service providers who perform services and functions on our behalf to support our interactions with you including, for example, providing our services or communicating with you.

The Simmons Firm may also provide to third parties, including other businesses and members of the public, aggregated statistical data showing general usage patterns and statistics, interactions, and transactions with our Sites and Services. This data does not personally identify you or provide specific information about individual usage.

In addition, we may disclose information about you:

- If we are required to do so by law or legal process;
- To law enforcement authorities or other government officials;
- When we believe disclosure is necessary or appropriate to prevent physical harm or financial loss or in connection with an investigation of suspected or actual illegal activity;
- If this is necessary to protect the vital interests of a person;
- To enforce our Terms of Use;
- To protect our property, services and legal rights;
- To prevent fraud against the Simmons Firm, our affiliates, or business partners;
- To support auditing, compliance, and corporate governance functions; or
- To comply with any and all applicable laws.

Social Networking

Our Sites and Services may allow you sign into and associate your social network accounts including, but not limited to, Twitter, LinkedIn, and Facebook with the Simmons Firm.

By using this functionality, you give the Simmons Firm permission to access all of the elements of your social network profile information that you have made available to be shared and to use it in accordance with the social network's terms of use and this Privacy Policy. Please refer to the privacy settings in your social network account for information about what data is shared with us and other connected applications and to manage the data that is shared through your account, including information about your activities using our Sites.

If you would like to disconnect a social media account from us, refer to the settings of that social media account and its provider.

Cookies

Our Sites and Services may place cookies, web beacons, pixels, clear gifs, and other similar technologies (collectively "Cookies and Other Tracking Technologies") on your devices. A cookie is a small text file that can be stored on and accessed from your device when you visit one of our Sites. The other tracking technologies work similarly to cookies and place small data files on your devices or monitor your website activity to enable us to collect information about how you use our Sites. We may collect information about you or from activity on devices associated with you as soon as you visit our Sites and Services. By using our Sites and Services you permit us to collect and use your information from activity on devices associated with you in accordance with this Privacy Policy.

We use Cookies and Other Tracking Technologies to collect information about how you use the Sites and Services. Many Internet browsers and mobile devices allow you to block the transmission of information, such as your IP address or location information, or to block the installation of cookies. You may choose to enable these options. However, enabling these options may prevent you from using many of the core features and functions available on our Sites and Services.

Information Security

The Simmons Firm has implemented an information security program that contains administrative, technical and physical controls that are designed to reasonably safeguard information that can individually identify you.

You can also ask us to update the information we have collected about you by contacting us at 800-209-0411 or information@simmonsfirm.com.

Business Transfers or Changes

We reserve the right to disclose and transfer all information related to the Sites and Services, including personal information:

- to a subsequent owner, co-owner or operator of one or more of the Sites; or
- in connection with a corporate merger, consolidation, or restructuring, the sale of substantially all of our stock and/or assets, or other corporate change, including, without limitation, during the course of any due diligence process.

Children's Privacy

Our Sites are general audience sites not directed at children under the age of 13. If we obtain actual knowledge that any information we collect has been provided by a child under the age of 13, we will promptly delete that information.

California Privacy Rights

Pursuant to California Civil Code Section 1798.83(c)(2), the Simmons Firm does not share your personal information with third parties for those third parties' direct marketing use.

Contact Us

Please Contact Us if you have any questions or comments about our privacy practices or this Privacy Policy. You can reach us at information@simmonsfirm.com or by calling (855) 264-6270.

Simmons Support Team Last modified: December 17, 2020

Written by:Simmons Hanly Conroy

Editorial Team

The Simmons Hanly Conroy Editorial Team consists of journalists, writers and editors who strive to deliver accurate and useful information to families needing legal help. Our team works alongside the firm's attorneys and shareholders, as well as with medical professionals and other specialists, to keep all information relevant and helpful.

EXHIBIT 94

VOGUE

Privacy Preference Center

We process user data to deliver (and measure the delivery of) content or advertisements, generate insights and reports to understand service usage, and/or access or store information on devices for that purpose. Please see below to learn why we process data and exercise your preferences for processing, and/or see our partners. If you are unable to change these cookies settings, your detected location is outside of the region that is able to do so.

Manage Consent Preferences

— Strictly Necessary Cookies Always Active

These cookies are necessary for the website to function and cannot be switched off in our systems. They are usually only set in response to actions made by you which amount to a request for services, such as setting your privacy preferences, logging in or filling in forms. You can set your browser to block or alert you about these cookies, but some parts of the site will not then work. These cookies do not store any personally identifiable information.

— Functional Cookies Always Active

Continue To Site

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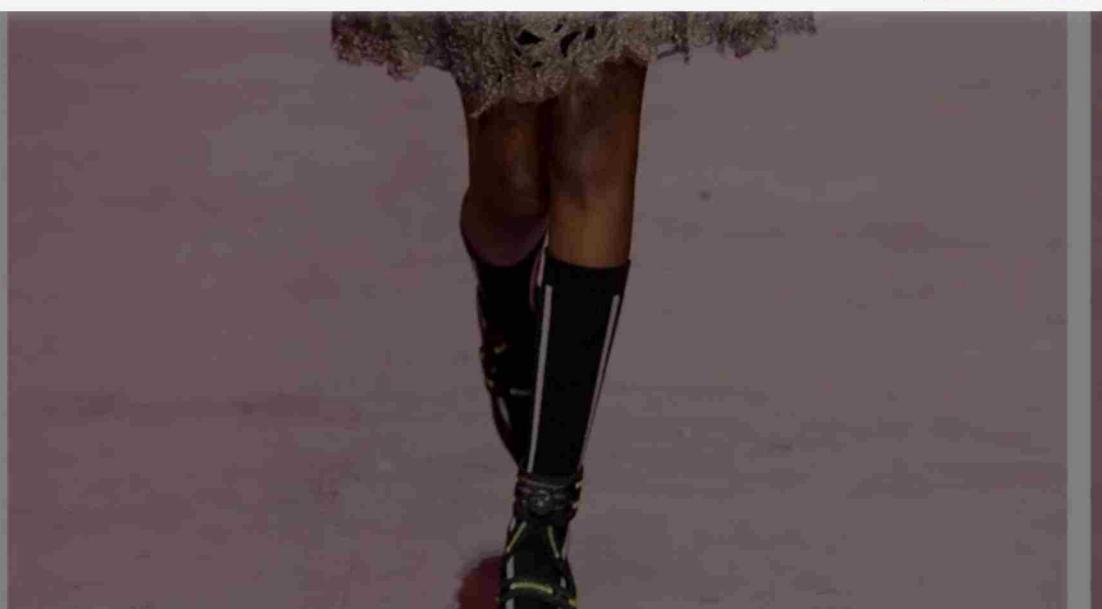


EXHIBIT 95

Cookie Notice



Updated: February 15, 2022

This Cookie Notice (“Notice”) explains how WP Company LLC (“**The Washington Post**,” “we,” or “us”), along with our partners, including advertisers and vendors, use cookies and similar tracking technologies when you use our websites, applications, email newsletters, and other online products services that link to this policy (“Services”). This Notice also explains your choices with respect to cookies and other similar technologies. This Notice is part of the Washington Post Privacy Policy available [here](#).

What Are Cookies and How Are They Used?

Cookies and other tracking technologies on the Services, including but not limited to web beacons/GIFs, pixels, and SDKs (together “Cookies” unless otherwise stated) are small files or technologies that are placed on your computer or device when you visit an online site, service or app. They are used to recognize visitors across one or more browsing sessions and across one or more sites. Cookies help enable certain features (like remembering you so you do not have to re-log in), improve the Services, and deliver advertising.

Cookies can be set by the site or service you are visiting (“first-party cookies”) or by a third party, such as analytics or advertising services (“third-party cookies”). Third parties may collect and use information as we have described in this Notice and our Privacy Policy and pursuant to their own privacy policies.

Types of Cookies

Our Services use the following types of first and third-party Cookies:

- *Strictly Necessary Cookies* are necessary for our services to function properly and securely. They cannot be switched off in our systems. You can set your browser to block or alert you about these cookies, but some parts of the Services will not work.
- *Functional Cookies* enable us to provide enhanced functionality and personalization by remembering your preferences or settings when you return to our Services. Without these cookies, certain features may not function properly.
- *Performance Cookies* allow us to count visits and traffic sources so we can measure and improve the performance of our Services. They help us to know which parts of the Services are the most and least popular and see how visitors use our Services. We use third-party cookies, such as Google Analytics, to help with performance and analytics.
- *Targeting or Advertising Cookies* help deliver advertisements, make them more relevant and meaningful to users, and track the efficiency of advertising campaigns. We and our third-party advertising partners may use these cookies to build a profile of your interests and deliver relevant advertising on our Services, or on other sites or services. If you disable these Cookies, you may still see contextual advertising or ads based on information we have about you.
- *Social Media Cookies* are set by social media platforms on the Services to enable you to share content with your friends and networks. Social media platforms have the ability to track your online activity outside of the Services. This may impact the content and messages you see on other services you visit.

Choices

Depending on what you do, you may be able to adjust your cookie preferences at any time via a Manage Cookies option. You can also use the methods described below to manage certain Cookies and similar technologies. In many cases, including for Cookies, you must take such steps on each browser or device that you use. If you change or upgrade your browser or device, or delete your Cookies, you may need to use these opt-out tools again. Some Cookie-management solutions also rely on Cookies, so please adjust your browser Cookie settings carefully. We do not maintain or control the opt-out mechanisms and settings below and are not responsible for their operation.

Browser Controls: You may be able to disable and manage some Cookies through your browser settings. Instructions for how to manage Cookies in popular browsers are available at: [Internet Explorer](#), [Firefox](#), [Chrome](#), [Safari \(iOS\)](#), [Safari \(Mac\)](#), and [Opera](#). For other browsers, you can also visit your browser's help menu.

Mobile Settings: Your mobile device may also include settings that allow you to manage the use of cookies, such as Limit Ad Tracking or Tracking settings in iOS and Opt out of Ads Personalization in Android.

Analytics: To disable certain analytics Cookies, you can use the browser controls discussed above or, for some of our providers, you can use their individual opt-out mechanisms, such as the [Google Analytics Opt-Out](#), [Chartbeat at https://static.chartbeat.com/opt-out.html](#), and [Comscore at https://www.scorecardresearch.com/optout.aspx?newlanguage=1](#).

Interest-Based Advertising: Most third-party advertisers offer a way to opt out of their interest-based advertising. In addition to the steps described above, you may opt-out of certain targeted advertising from participating entities by visiting the [Network Advertising Initiative](#) and [Digital Advertising Alliance in the US](#), [Digital Advertising Alliance in the US](#), [Digital Advertising Alliance of Canada](#), [European Interactive Digital Advertising Alliance](#), [Australian Digital Advertising Alliance](#).

You can also opt out of some of the advertising providers and vendors we use by visiting their settings or opt-out pages, such as [Google's Opt-Out page](#), [Facebook's Settings](#), [LiveIntent's Ad Choices page](#), and [LiveRamp's Opt-Out Page](#).

If you opt out through these methods, you may still see advertisements, but they may not be as relevant to you.

Consequences of Deactivation of Cookies: If you disable or remove Cookies, some parts of the Services may not function properly. Information may still be collected and used for other purposes, such as internal operations and to remember your opt-out preferences.